

VERBATIM**RECORD OF TRIAL²**

(and accompanying papers)

of

MANNING, Bradley E.

(Name: Last, First, Middle Initial)

██████████PFC/E-3Headquarters andHeadquarters Company,United States Army Garrison

(Unit/Command Name)

(Social Security Number)

(Rank)

U.S. ArmyFort Myer, VA 22211

(Branch of Service)

(Station or Ship)

By

GENERAL**COURT-MARTIAL**

Convened by

Commander

(Title of Convening Authority)

UNITED STATES ARMY MILITARY DISTRICT OF WASHINGTON

(Unit/Command of Convening Authority)

Tried at

Fort Meade, MD

(Place or Places of Trial)

ON

see below

(Date or Dates of Trial)

Date or Dates of Trial:

23 February 2012, 15-16 March 2012, 24-26 April 2012, 6-8 June 2012, 25 June 2012,
 16-19 July 2012, 28-30 August 2012, 2 October 2012, 12 October 2012, 17-18 October 2012,
 7-8 November 2012, 27 November - 2 December 2012, 5-7 December 2012, 10-11 December 2012,
 8-9 January 2013, 16 January 2013, 26 February - 1 March 2013, 8 March 2013,
 10 April 2013, 7-8 May 2013, 21 May 2013, 3-5 June 2013, 10-12 June 2013, 17-18 June 2013,
 25-28 June 2013, 1-2 July 2013, 8-10 July 2013, 15 July 2013, 18-19 July 2013,
 25-26 July 2013, 28 July - 2 August 2013, 5-9 August 2013, 12-14 August 2013,
 16 August 2013, and 19-21 August 2013.

¹ Insert "verbatim" or "summarized" as appropriate. (This form will be used by the Army and Navy for verbatim records of trial only.)² See inside back cover for instructions as to preparation and arrangement.

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Monday, July 25, 2011 9:55 AM
To: COFFMAN, CARL R COL MIL USA IMCOM
Cc: Matthew kemkes; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; coombs@armycourtmartialdefense.com; paul.bouchard@us.army.mil; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; Joshua Tooman; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Subject: US v. PFC BM (Art 32 Delay Request)
Attachments: 11-Jul-25-Government Request to Delay Article 32 (ManningB).pdf
Importance: High

Sir,

The United States requests an additional delay of the Article 32. Please see the attached request.

v/r
CPT Fein

Ashden Fein
CPT, JA

From: COFFMAN, CARL R COL MIL USA IMCOM <carl.coffman@us.army.mil>
Sent: Monday, July 25, 2011 3:32 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: Matthew kemkes <matthew.kemkes@us.army.mil>; Morrow III, JoDean, CPT USA
JFHQ-NCR/MDW SJA <JoDean.Morrow@jfhqncr.northcom.mil>;
coombs@armycourtmartialdefense.com; paul.bouchard@us.army.mil; Overgaard, Angel
M. CPT USA JFHQ-NCR/MDW SJA <Angel.Overgaard@jfhqncr.northcom.mil>; Ford,
Arthur D. WO1 USA JFHQ-NCR/MDW SJA <Arthur.Ford@jfhqncr.northcom.mil>;
Joshua Tooman <joshua.tooman@us.army.mil>; Ford, Arthur D. WO1 USA JFHQ-
NCR/MDW SJA <Arthur.Ford@jfhqncr.northcom.mil>
Subject: Re: US v. PFC BM (Art 32 Delay Request) (UNCLASSIFIED)

Classification: UNCLASSIFIED

Mr. Coombs.

Does the Defense have any issues with the request?

COL Coffman

From: coombs@armycourtmartialdefense.com
Sent: Monday, July 25, 2011 5:52 PM
To: COFFMAN,CARL R COL MIL USA IMCOM <carl.coffman@us.army.mil>
Cc: Matthew kemkes <matthew.kemkes@us.army.mil>; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA <JoDean.Morrow@jfhqnqr.northcom.mil>; paul.bouchard@us.army.mil; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA <Angel.Overgaard@jfhqnqr.northcom.mil>; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA <Arthur.Ford@jfhqnqr.northcom.mil>; Joshua Tooman <joshua.tooman@us.army.mil>; Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqnqr.northcom.mil>
Subject: [Suspected SPAM] RE: US v. PFC BM (Art 32 Delay Request) (UNCLASSIFIED)
Attach: Article 32 Delay Request.pdf

Sir,

Please see the attached document for the defense response.

V/R
David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Office: 1-800-588-4156
Fax: (508) 689-9282
coombs@armycourtmartialdefense.com
www.armycourtmartialdefense.com

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Filename: RE: Protective Orders
(UNCLASSIFIED).msg

From: Fein, Ashden CPT USA JFHQ-NCR/MDW
SJA <ashden.fein@organization.com>

Sent: Tuesday, July 26, 2011 7:14 AM

Subject: RE: Protective Orders (UNCLASSIFIED)

Size: 42KB (41,984 bytes)

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Tuesday, July 26, 2011 8:10 AM
To: coombs@armycourtmartialdefense.com
Cc: Matthew kemkes; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; paul.bouchard@us.army.mil; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; Joshua Tooman
Subject: US v. PFC BM Discovery
Importance: High

David,

Good morning. We received your memorandum to the SPCMCA in reference to the Article 32 delay request.

Yesterday, we delivered to MAJ Kemkes and placed in the US Mail for you, three DVDs of discovery. These DVDs contain the majority of the unclassified CID case file (BATES 21364 - 36617), including a DVD of native files for certain file types. We are continuing to sort through the remaining information and seek the approvals we must have in order to produce everything that is discoverable. As we have discussed in the past, our intent is to send the information in waves as we receive approvals and not wait until we receive all approvals.

Below is a summary of the acknowledged protective orders we have received. Pursuant to the protective orders, please ensure the information is not shared with any team member until we receive a copy of the signed acknowledgments and initialed (or signed) federal protective orders.

100% - Coombs, Kemkes, Santiago, and Purcell
Partial - Tooman
None - All others

v/r
Ashden

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Tuesday, July 26, 2011 8:10 AM
To: 'coombs@armycourtmartialdefense.com'
Cc: Matthew kemkes; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA;
'paul.bouchard@us.army.mil'; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford,
Arthur D. WO1 USA JFHQ-NCR/MDW SJA; 'Joshua Tooman'
Subject: US v. PFC BM Discovery
Importance: High

David,

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Below is a summary of the acknowledged protective orders we have received. Pursuant to the protective orders, please ensure the information is not shared with any team member until we receive a copy of the signed acknowledgments and initialed (or signed) federal protective orders.

100% - Coombs, Kemkes, Santiago, and Purcell
Partial - Tooman
None - All others

v/r
Ashden

From: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Sent: Tuesday, July 26, 2011 8:29 AM
To: Bouchard, Paul R CPT MIL USA OSA
Cc: coombsc@armycourtmartialdefense.com; edl@cyberagentsinc.com; Fein, Ashden CPT USA JFHQ-NCR/MDW SJA; Feito, Beatriz SGT USA JFHQ- NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Parra, Jairo A. WO1 USA JFHQ-NCR/MDW SJA; Waybright, Daniel W. SGT USA JFHQ-NCR/MDW SJA; Whyte, Jeffrey H. CPT USA JFHQ-NCR/MDW SJA
Subject: RE: Clarification; for computer forensic expert, Mr. Eric Lakes and Cyber Agents (UNCLASSIFIED)
Signed By: arthur.ford@Jfhqnrc.northcom.mil

Classification: UNCLASSIFIED

Caveats: FOUO

Sir,

Thank you very much for clearing that up for us.

V/R,

Arthur Ford
WO1, JA
Legal Administrator
Comm: 202-685-1975
BB: 571-289-9690

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Tuesday, July 26, 2011 9:13 AM
To: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; 'Bouchard, Paul R CPT MIL USA OSA' 'coombs@armycourtmartiakdefense.com'; 'edl@cyberagentsinc.com'; Feito, Beatriz SGT USA JFHQ- NCR/MDW SJA; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Parra, Jalro A. WO1 USA JFHQ- NCR/MDW SJA; Waybright, Daniel W. SGT USA JFHQ-NCR/MDW SJA; Whyte, Jeffrey H. CPT USA JFHQ-NCR/MDW SJA
Cc:
Subject: RE: Clarification; for computer forensic expert, Mr. Eric Lakes and Cyber Agents (UNCLASSIFIED)

Paul,

What about Trent Struttmann's clearance information? Could you please send us his SSN so we can verify his clearance. Thank you.

Ashden

From: Bouchard, Paul R CPT MIL USA OSA <paul.r.bouchard@us.army.mil>
Sent: Tuesday, July 26, 2011 9:19 AM
To: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
<Arthur.Ford@jfhqnqr.northcom.mil>
Cc: coombs@armycourtmaritaldefense.com; edl@cyberagentsinc.com; Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqnqr.northcom.mil>; Feito, Beatriz SGT USA JFHQ- NCR/MDW SJA <Beatriz.Feito@jfhqnqr.northcom.mil>; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA <Arthur.Ford@jfhqnqr.northcom.mil>; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA <JoDean.Morrow@jfhqnqr.northcom.mil>; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA <Angel.Overgaard@jfhqnqr.northcom.mil>; Parra, Jairo A. WO1 USA JFHQ- NCR/MDW SJA <Jairo.Parra@jfhqnqr.northcom.mil>; Waybright, Daniel W. SGT USA JFHQ-NCR/MDW SJA <Daniel.Waybright@jfhqnqr.northcom.mil>; Whyte, Jeffrey H. CPT USA JFHQ-NCR/MDW SJA <Jeffrey.Whyte@jfhqnqr.northcom.mil>
Subject: Re: RE: Clarification; for computer forensic expert, Mr. Eric Lakes and Cyber Agents
(UNCLASSIFIED)

Roger. Chief.
V/R
CPT Bouchard

From: Bouchard, Paul R CPT MIL USA OSA <paul.r.bouchard@us.army.mil>
Sent: Tuesday, July 26, 2011 9:21 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
<Arthur.Ford@jfhqncr.northcom.mil>; coombs@armycourtmartialdefense.com;
edl@cyberagentsinc.com; Feito, Beatriz SGT USA JFHQ- NCR/MDW SJA
<Beatriz.Feito@jfhqncr.northcom.mil>; Morrow III, JoDean, CPT USA JFHQ-
NCR/MDW SJA <JoDean.Morrow@jfhqncr.northcom.mil>; Overgaard, Angel M. CPT
USA JFHQ-NCR/MDW SJA <Angel.Overgaard@jfhqncr.northcom.mil>; Parra, Jairo A.
WO1 USA JFHQ-NCR/MDW SJA <Jairo.Parra@jfhqncr.northcom.mil>; Waybright,
Daniel W. SGT USA JFHQ-NCR/MDW SJA
<Daniel.Waybright@jfhqncr.northcom.mil>; Whyte, Jeffrey H. CPT USA JFHQ-
NCR/MDW SJA <Jeffrey.Whyte@jfhqncr.northcom.mil>
Subject: Re: RE: Clarification; for computer forensic expert, Mr. Eric Lakes and Cyber Agents
(UNCLASSIFIED)

Roger, Ashden.
I'm on it.
V/R
Paul

From: Tooman, Joshua J CPT MIL US USA TRADOC [joshua.tooman@us.army.mil]
Sent: Tuesday, July 26, 2011 1:39 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Subject: RE: Protective Orders (UNCLASSIFIED)
Attachments: Fed_Protective_Orders.pdf
Signed By: joshua.tooman@us.army.mil

Classification: UNCLASSIFIED

Caveats: FOUO

Ashden

See attached.

Thanks,
Josh

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Tuesday, July 26, 2011 9:40 PM
To: 'Almanza, Paul'
Cc: 'coombs@armycourtmartialdefense.com'; Matthew kemkes; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; paul.bouchard@us.army.mil; 'Haberland, John CPT MIL USA'; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; 'Joshua Tooman'
Subject: US v. PFC BM Article 32 Delay
Attachments: 11-Jul-26-SPCMCA Delay of Article 32 Investigation (ManningB).pdf

LTC Almanza,

Good evening. Please find attached an Article 32 delay approval signed by the SPCMCA.

Thank you.

v/r
CPT Fein

Ashden Fein
CPT, JA

From: Bouchard, Paul Mr CIV USA AMC <paul.bouchard@us.army.mil>
Sent: Tuesday, July 26, 2011 9:41 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Subject: Out of Office AutoReply: US v. PFC BM Article 32 Delay

I will be on travel until August 1. I will be checking email. My cell is 518-320-0091 for urgent matters.
Paul

From: Almanza, Paul <Paul.Almanza@usdoj.gov>
Sent: Wednesday, July 27, 2011 8:36 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: coombs@armycourtmaritaldefense.com; Matthew kemkes
<matthew.kemkes@us.army.mil>; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW
SJA <JoDean.Morrow@jfhqncr.northcom.mil>; paul.bouchard@us.army.mil;
Haberland,John CPT MIL USA <john.haberland@us.army.mil>; Overgaard, Angel M.
CPT USA JFHQ-NCR/MDW SJA <Angel.Overgaard@jfhqncr.northcom.mil>; Ford,
Arthur D. WO1 USA JFHQ-NCR/MDW SJA <Arthur.Ford@jfhqncr.northcom.mil>;
Joshua Tooman <joshua.tooman@us.army.mil>
Subject: RE: US v. PFC BM Article 32 Delay

Thank you, CPT Fein.

LTC Almanza

From: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Sent: Wednesday, July 27, 2011 8:52 AM
To: Bouchard, Paul R CPT MIL USA OSA
Cc: edi@cyberagentsinc.com; coombs@armycourtmartialdefense.com; Fein, Ashden CPT USA JFHQ-NCR/MDW SJA; Feito, Beatriz SGT USA JFHQ- NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Parra, Jairo A. WO1 USA JFHQ-NCR/MDW SJA; Waybright, Daniel W. SGT USA JFHQ-NCR/MDW SJA; Whyte, Jeffrey H. CPT USA JFHQ-NCR/MDW SJA
Subject: RE: Computer forensics, US v. Manning (UNCLASSIFIED)
Signed By: arthur.ford@Jfhqnrcr.northcom.mil

Classification: UNCLASSIFIED

Caveats: FOUO

Sir,

Thanks for your response. Mr. Lakes was not given a clearance for this case; he already had one. If you want to request that Mr. Struttman be granted a security clearance, you will need to request it in writing and provide justification through the convening authority to the Army G2.

We can make it happen pretty quickly, if the convening authority approves. Please let me know. Thanks.

V/R,

Arthur Ford
WO1, JA
Legal Administrator
Comm: 202-685-1975
BB: 571-289-9690

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Wednesday, July 27, 2011 5:18 PM
To: matthew.kemkes@conus.army.mil
Cc: Parra, Jairo A. WO1 USA JFHQ-NCR/MDW SJA
Subject: Forensic Expert Location

Sir,

Are you available to chat? I would like to discuss the possibility of having the BM forensic team setup at the Meade TDS. Thanks.

Ashden

Tracking:

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Wednesday, July 27, 2011 7:58 PM
To: 'coombs@armycourtmartialdefense.com'
Subject: Friday chat

David. Are you available to chat friday morning? I want to give you an update if you would like. Have a good evening.

Ashden

From: coombs@armycourtmartialdefense.com
Sent: Wednesday, July 27, 2011 8:00 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqnqr.northcom.mil>
Subject: RE: Friday chat

Ashden,

Sounds good. What time do you want to have the chat?

Best,
David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Office: 1-800-588-4156
Fax: (508) 689-9282
coombs@armycourtmartialdefense.com
www.armycourtmartialdefense.com

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From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Wednesday, July 27, 2011 8:16 PM
To: 'coombs@armycourtmartialdefense.com'
Subject: Re: Friday chat

How is 1030?

From: coombs@armycourtmartialdefense.com
Sent: Wednesday, July 27, 2011 8:19 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqnrc.northcom.mil>
Subject: RE: Friday chat

Good for me. Just give me a call at the 401-744-3007 number.

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Office: 1-800-588-4156
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coombs@armycourtmartialdefense.com
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From: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Sent: Thursday, July 28, 2011 1:08 PM
To: coombsb@armycourtmartialdefense.com
Cc: Bouchard, Paul R CPT MIL USA OSA; Fein, Ashden CPT USA JFHQ-NCR/MDW SJA;
Feito, Beatrice SGT USA JFHQ- NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-
NCR/MDW SJA; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Overgaard, Angel
M. CPT USA JFHQ-NCR/MDW SJA; Parra, Jairo A. WO1 USA JFHQ-NCR/MDW SJA;
Waybright, Daniel W. SGT USA JFHQ-NCR/MDW SJA; Whyte, Jeffrey H. CPT USA JFHQ-
NCR/MDW SJA
Subject: FW: Request for Secret Clearance, Mr. Trent Struttmann, US v. Manning (UNCLASSIFIED)
Attachments: Request for Sec Clearance, Struttmann.pdf; Renewed Expert Request, PDF[1].pdf; Request
for Expert Assistant for U S v PFC Manning[1].pdf
Signed By: arthur.ford@Jfhqncr.northcom.mil

Classification: UNCLASSIFIED

Caveats: FOUO

Sir,

Acknowledging receipt. Thank you.

V/R,

Arthur Ford
WO1, JA
Legal Administrator
Comm: 202-685-1975
BB: 571-289-9690

From: coombs@armycourt martialdefense.com
Sent: Thursday, July 28, 2011 1:34 PM
To: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
<Arthur.Ford@jfhqnrcr.northcom.mil>
Cc: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqnrcr.northcom.mil>;
Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA
<JoDean.Morrow@jfhqnrcr.northcom.mil>; Matthew kemkes
<matthew.kemkes@us.army.mil>; Paul Bouchard <bouchardp@yahoo.com>; Joshua
Tooman <joshua.tooman@us.army.mil>
Subject: [Suspected SPAM] RE: DVD for discovery (UNCLASSIFIED)

Mr. Ford,

I receive three CDs today. I tried opening the contents of each CD. Each time, I try the password "US v. Manning" or any variation thereof, I receive "Wrong password. Please try again." Did you change the password?

Best,
David

David E. Coombs, Esq.
Law Office of David E. Coombs
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Providence, RI 02906
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Fax: (508) 689-9282
coombs@armycourt martialdefense.com
www.armycourt martialdefense.com

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From: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Sent: Thursday, July 28, 2011 2:32 PM
To: coombs@armycourtmaritaldefense.com
Cc: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA; Morrow III, JoDean, CPT USA JFHQ-
NCR/MDW SJA; Matthew Kemkes; Paul Bouchard; Joshua Tooman;
melissa.s.santiago@us.army.mil
Subject: RE: [Suspected SPAM] RE: DVD for discovery (UNCLASSIFIED)
Signed By: arthur.ford@Jfhqncr.northcom.mil

Classification: UNCLASSIFIED

Caveats: FOUO

Sir,

I apologize for that. The password for this series of discs is "U.S. v. PFC Bradley Manning". Additionally, the files named 22863-23362 and 24363-24862 have a password of "U.S. v. Bradley Manning".

This is a complete oversight on my part. I am writing an SOP for this process right now, so that we do not have this happen again.

"U.S. v. PFC Bradley Manning" is a more secure password, and will be the one required by our SOP.

Thank you bringing it to my attention, and thank you for your patience as I iron out the kinks in this new process.

V/R,

Arthur Ford
WO1, JA
Legal Administrator
Comm: 202-685-1975
BB: 571-289-9690

From: coombs@armycourtmartialdefense.com
Sent: Thursday, July 28, 2011 6:14 PM
To: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
<Arthur.Ford@jfhqncr.northcom.mil>
Cc: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>;
Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA
<JoDean.Morrow@jfhqncr.northcom.mil>; Matthew kemkes
<matthew.kemkes@us.army.mil>; Paul Bouchard <bouchardp@yahoo.com>; Joshua
Tooman <joshua.tooman@us.army.mil>; melissa.s.santiago@us.army.mil
Subject: RE: [Suspected SPAM] RE: DVD for discovery (UNCLASSIFIED)

Mr. Ford,

No worries. Thank you for responding so quickly. So far I have not had a problem opening any of the files. I have around six more to go. I will let you know if I have any issues.

Best,
David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Office: 1-800-588-4156
Fax: (508) 689-9282
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From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Friday, July 29, 2011 10:56 AM
To: coombs@armycourtmartialdefense.com
Subject: RE: Friday chat

David,

Once again, I apologize. We have an awards ceremony that I could not escape. I will be calling in 10 min if you are available. Thanks.

From: coombs@armycourtmartialdefense.com
Sent: Friday, July 29, 2011 10:55 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqnqr.northcom.mil>
Subject: RE: Friday chat

Ashden,

Do you still want to talk this morning?

Best,

David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Office: 1-800-588-4156
Fax: (508) 689-9282
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From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Friday, July 29, 2011 11:06 AM
To: coombs@armycourtmartialdefense.com
Subject: RE: Friday chat

David,

I apologize again. I should have known better scheduling a phone call for Friday morning. Lesson learned. Between connectivity issues and the awards ceremony, this morning is proving to be difficult. We are heading to a meeting at 1130 and should be back by 1500. How is 1600?

Ashden

From: coombs@armycourtmartialdefense.com
Sent: Friday, July 29, 2011 11:25 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Subject: RE: Friday chat

Ashden,

This afternoon does not work well for me. Let's shoot for Monday. What would be a good time for you?

Best,
David

David E. Coombs, Esq.
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From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Friday, July 29, 2011 2:15 PM
To: coombs@armycourtmartialdefense.com
Subject: RE: Friday chat

How about 1300?

From: coombs@armycourtmartialdefense.com
Sent: Friday, July 29, 2011 4:01 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqnqr.northcom.mil>
Subject: RE: Friday chat

Sounds good. Have a great weekend.

Best,
David

David E. Coombs, Esq.
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11 South Angell Street, #317
Providence, RI 02906
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From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Friday, July 29, 2011 4:09 PM
To: coombs@armycourtmartialdefense.com
Subject: RE: Friday chat

Same with you and your wife.

From: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Sent: Monday, August 01, 2011 2:30 PM
To: Bouchard, Paul R CPT MIL USA OSA
Cc: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA; Feito, Beatriz SGT USA JFHQ- NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Parra, Jairo A. WO1 USA JFHQ-NCR/MDW SJA; Waybright, Daniel W. SGT USA JFHQ-NCR/MDW SJA; Whyte, Jeffrey H. CPT USA JFHQ-NCR/MDW SJA
Subject: RE: Computer forensics, US v. Manning (UNCLASSIFIED)
Signed By: arthur.ford@Jfhqncr.northcom.mil

Classification: UNCLASSIFIED

Caveats: FOUO

Sir,

I am putting the documents together for this request. Can you please send me Mr. Struttmann's date and place of birth? Thanks.

V/R,

Arthur Ford
WO1, JA
Legal Administrator
Comm: 202-685-1975
BB: 571-289-9690

-----Original Message-----

From: Bouchard, Paul R CPT MIL USA OSA [mailto:paul.r.bouchard@us.army.mil]
Sent: Tuesday, July 26, 2011 12:30 PM
To: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Cc: ed1@cyberagentsinc.com
Subject: Computer forensics, US v. Manning

Mister Ford:

Trent Struttmann's SSN is 404-25-6274.

I'm sorry I didn't know this earlier, but he will need a security clearance. The Government got one for Mr. Lakes and now one of his employees, Mr. Struttmann, will need the same. Please keep me in the loop on this -- paperwork, etc. Also, how long do you think it will take for Mr. Struttmann to get a security clearance?

Appreciate any feedback, and I apologize for not knowing earlier that Mr. Struttmann needs a clearance.

V/R
CPT Paul Bouchard

----- Original Message -----

From: "Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA"
<Arthur.Ford@jfhqnqr.northcom.mil>
Date: Tuesday, July 26, 2011 8:28
Subject: RE: Clarification; for computer forensic expert, Mr. Eric Lakes and
Cyber Agents (UNCLASSIFIED)
To: "Bouchard, Paul R CPT MIL USA OSA" <paul.r.bouchard@us.army.mil>
Cc: coombs@armycourtmartialdefense.com, edl@cyberagentsinc.com, "Fein,
Ashden CPT USA JFHQ-NCR/MDW SJA" <Ashden.Fein@jfhqnqr.northcom.mil>, "Feito,
Beatrix SGT USA JFHQ- NCR/MDW SJA" <Beatrix.Feito@jfhqnqr.northcom.mil>,
"Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA"
<Arthur.Ford@jfhqnqr.northcom.mil>, "Morrow III, JoDean, CPT USA
JFHQ-NCR/MDW SJA" <JoDean.Morrow@jfhqnqr.northcom.mil>, "Overgaard, Angel
M. CPT USA JFHQ-NCR/MDW SJA" <Angel.Overgaard@jfhqnqr.northcom.mil>, "Parra,
Jairo A. WO1 USA JFHQ-NCR/MDW SJA" <Jairo.Parra@jfhqnqr.northcom.mil>,
"Waybright, Daniel W. SGT USA JFHQ-NCR/MDW SJA"
<Daniel.Waybright@jfhqnqr.northcom.mil>, "Whyte, Jeffrey H. CPT USA
JFHQ-NCR/MDW SJA" <Jeffrey.Whyte@jfhqnqr.northcom.mil>

> Classification: UNCLASSIFIED
> Caveats: FOUO
>
> Sir,
>
> Thank you very much for clearing that up for us.
>
> V/R,
>
> Arthur Ford
> WO1, JA
> Legal Administrator
> Comm: 202-685-1975
> BB: 571-289-9690
>
>
> -----Original Message-----
> From: Bouchard, Paul R CPT MIL USA OSA
> [mailto:paul.r.bouchard@us.army.mil]
> Sent: Monday, July 25, 2011 6:02 PM
> To: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
> Cc: coombs@armycourtmartialdefense.com; edl@cyberagentsinc.com
> Subject: Clarification; for computer forensic expert, Mr. Eric
> Lakes and
> Cyber Agents (UNCLASSIFIED)
>
> Mister Ford:
>
> Thank you for your last e-mail. The following addresses the
> isssues you
> pointed out:
>
> Right now, we are still in the evidentiary phase of the case and our
> monetary request is simply for evidence review and not trial prep.
> US v.
> Manning, as you know, is a big case involving some 8 terabytes of
> data, data
> the Defense has yet to receive from the Government. As such, there

> is no way
> Mr. Eric Lakes can predict how long it will take him and one of his
> employees, Trent Struttmann, to do the analysis.
>
> The computer forensics analysis will take place in the D.C. area.
> It will be
> performed by Mr. Lakes and Mr. Struttmann. To reduce travel costs,
> they will
> drive together from Lexington, Kentucky, instead of flying into D.C.
>
> Cyber Agents will bill the Government weekly with the expectation
> of being
> paid on a monthly basis. Like any business, Cyber Agents has expenses
> (payroll, taxes, rent, etc.) and thus has cash flow needs.
>
> Our request came in at \$8,000.00 (\$5,600.00 already approved, plus
> \$2,400.00) plus travel expenses. If the computer forensics
> analysis takes
> longer than that covered by the \$8,000.00, then those additional
> hours would
> be billed at \$175.00 per hour. Mr. Lakes roughly estimated
> \$8,000.00 for him
> and Trent (plus travel expenses) to do the computer analysis, but
> again, there is no way of telling how long the computer analysis
> will take.
>
> Mr. Lakes would like to be paid half (\$4,000.00) upfront to cover
> travel for
> him and Trent. He informed me when he does cases involving the
> Marines he's
> paid half upfront for travel.
>
> Note: Mr. Lakes now charges \$1,600.00 per day per person for trial
> work instead of \$1,400.00 per day per person as listed on one of
> the old
> attachments. However, this rate deals with trial prep -- basically
> do we
> need Mr. Lakes, or one of his employees, to be at the trial and/or
> testify? Again, our request is for evidence review and analysis
> right now. The
> Defense does not know if we will need Mr. Lakes testimony or
> presence at the
> trial, but if we do, Cyber Agents will bill those services at that
> rate --
> \$1,600 per day per person.
>
> I hope this clears things up. Please feel free to e-mail me or
> call me
> anytime. My contact information is listed below.
>
> Respectfully,
>
> CPT Paul Bouchard
> Defense Counsel
> Trial Defense Services
> Fort Meade, MD 20724
> Office: 301-677-9231

> Cell: 915-603-7651
>
>
>
>
>
>
>
> ----- Original Message -----
> From: "Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA"
> <
> Date: Tuesday, July 19, 2011 19:33
> Subject: RE: Renewed request for computer forensic expert, Mr. Eric Lakes
> and Cyber Agents (UNCLASSIFIED)
> To: paul.r.bouchard@us.army.mil
> Cc: "Fein, Ashden CPT USA JFHQ-NCR/MDW SJA"
> <, "Morrow III, JoDean, CPT USA
> JFHQ-NCR/MDW SJA" <, "Overgaard, Angel
> M. CPT USA JFHQ-NCR/MDW SJA" <
>
>
> > Classification: UNCLASSIFIED
> > Caveats: FOUO
> >
> > Sir,
> >
> > I have some questions regarding your request. The request does not
> > match the fee schedule from the company.
> >
> > The company charges \$1,300 per additional hard drive, not \$175 per
> > hour. (However, this does work out to about a 7.5 hour work day,
> > so if this
> > is the rationale, I just need to know how Cyber Agents intends to
> > invoice.)
> > They also charge \$1,400 for trial prep, consulting, and testimony,
> > which is not addressed in the request. They charge this for every
> > day they
> > are out of their lab, and it is not addressed in your request. It
> > does not
> > address whether or not this is in addition to the \$1,300 per hard
> > drive, or
> > just when they are here doing something that is not forensics.
> > Whatever it
> > is, we need to know whether or not they will invoice us for it.
> >
> > The request mentions employees generally, but not by name. We need
> > to know who they are so we can get PO's signed and clear up any
> > security issues. Also, they need to tell us how many people they
> > are bringing so we
> > can estimate travel costs and ensure workstations are provided.
> >
> > I don't remember ever hearing of an expert, or any contractor, being
> > paid in advance, and if you or Mr. Coombs have negotiated this,
> > then we need
> > to know that.
> >
> > Thanks very much, Sir.

> >
> > V/R,
> >
> > WO1 Arthur Ford
> > Legal Administrator
> > OSJA, USAMDW
> > 202-685-1975
> > 571-289-9690
> >
> >
> > -----Original Message-----
> > From: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
> > Sent: Wednesday, July 13, 2011 2:42 PM
> > To: Feito, Beatriz SGT USA JFHQ- NCR/MDW SJA
> > Subject: FW: Renewed request for computer forensic expert, Mr.
> > Eric Lakes
> > and Cyber Agents (UNCLASSIFIED)
> >
> > Classification: UNCLASSIFIED
> > Caveats: FOUO
> >
> >
> >
> > V/R,
> >
> > WO1 Arthur Ford
> > Legal Administrator
> > OSJA, USAMDW
> > 202-685-1975
> > 571-289-9690
> >
> >
> > -----Original Message-----
> > From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
> > Sent: Wednesday, July 13, 2011 2:38 PM
> > To: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; Overgaard, Angel M.
> > CPT USA
> > JFHQ-NCR/MDW SJA
> > Subject: FW: Renewed request for computer forensic expert, Mr.
> > Eric Lakes
> > and Cyber Agents
> >
> >
> >
> >
> >
> > Ashden Fein
> > CPT, JA
> >
> >
> > -----Original Message-----
> > From: Paul Bouchard [mailto:bouchardp@yahoo.com]
> > Sent: Thursday, July 07, 2011 2:30 AM
> > To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
> > Cc: coombs@armycourtmartialdefense.com; edl@cyberagentsinc.com
> > Subject: Renewed request for computer forensic expert, Mr. Eric
> > Lakes and

> > Cyber Agents
>
> > Ashden:
>
> > This is what we talked about -- the Defense renews its request for
> > Mr. Eric
> > Lakes and his company, Cyber Agents Inc., as an expert assistant
> > for the
> > Defense team. See attachments -- Mr. Lakes was previously approved
> > by the
> > original convening authority for \$5,600.00. Given the amount of
> > data in the
> > case at hand, Mr. Lakes will need more funding to include costs
> > associated for travel.
> > Importantly, given that there is no way to precisely pinpoint how
> > long and
> > time consuming the computer forensics will take, we are asking
> > that any
> > additional work be billed and subsequently paid at \$175.00 per hour.
>
> > The first attachment clearly outlines our requests. The other
> > attachments are supporting documents.
>
> > I'll be at Fort Meade late next week.
>
> > E-mail me or call me (915-603-7651) should you have any questions.
>
> > Best,
>
> > Paul
>
> > Classification: UNCLASSIFIED
> > Caveats: FOUO
>
>
>
> > Classification: UNCLASSIFIED
> > Caveats: FOUO
>
>
>
> > Classification: UNCLASSIFIED
> > Caveats: FOUO
>
>
Classification: UNCLASSIFIED
Caveats: FOUO

From: Tooman, Joshua J CPT MIL US USA TRADOC [joshua.tooman@us.army.mil]
Sent: Monday, August 01, 2011 3:10 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Subject: Protective Orders (UNCLASSIFIED)
Signed By: joshua.tooman@us.army.mil

Classification: UNCLASSIFIED

Caveats: FOUO

Ashden

Can you verify that I have submitted all the necessary protective orders?

Thanks,
Josh

CPT Joshua J. Tooman
Defense Counsel
U.S. Army Trial Defense Service
415 Custer Avenue
Fort Leavenworth, Kansas 66027
Phone: (913) 684-1866
Fax: (913) 684-1863
DSN - 552-1866

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Classification: UNCLASSIFIED

Caveats: FOUO

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Monday, August 01, 2011 4:15 PM
To: Tooman, Joshua J CPT MIL US USA TRADOC
Cc: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Subject: RE: Protective Orders (UNCLASSIFIED)

Josh,

I am kicking this to Mr. Ford for reply.

Ashden

From: Tooman, Joshua J CPT MIL US USA TRADOC [joshua.tooman@us.army.mil]
Sent: Monday, August 01, 2011 5:02 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Subject: RE: Protective Orders (UNCLASSIFIED)
Signed By: joshua.tooman@us.army.mil

Classification: UNCLASSIFIED

Caveats: FOUO

Thanks, Ashden.

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Monday, August 01, 2011 6:01 PM
To: coombs@armycourtmaritaldefense.com
Cc: Matthew kemkes; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; paul.bouchard@us.army.mil; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; Joshua Tooman
Subject: Update

David,

Pursuant to our conversation today, below are some updates:

1. You asked about additional classified information being found above the approx 10,000 on BM's personal computer: Yes, much more. It was found on additional media devices that are not USG owned. The items are listed in the unclas case file we produced. MTF on the details of the information from the classified side of the file.
2. We intend on providing your defense experts a sterile laptop computer with Windows 7 for classified information. We intend on providing a location (Ft Meade TDS) and a 5 drawer safe. We also will provide a Lacie 8Tb cube of classified forensic images of all the forensic evidence. We expect them to bring their own encase software and other software forensic tools.
3. We will provide all recordings we have from confinement at the TCF and Quantico in the next wave of discovery, after tomorrow's CD is sent.

v/r
Ashden

From: coombs@armycourtmartialdefense.com
Sent: Monday, August 1, 2011 10:28 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqnrcr.northcom.mil>
Cc: Matthew kemkes <matthew.kemkes@us.army.mil>; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA <JoDean.Morrow@jfhqnrcr.northcom.mil>; paul.bouchard@us.army.mil; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA <Angel.Overgaard@jfhqnrcr.northcom.mil>; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA <Arthur.Ford@jfhqnrcr.northcom.mil>; Joshua Tooman <joshua.tooman@us.army.mil>
Subject: [Suspected SPAM] RE: Update

Ashden,

1. Can you tell me which media devices (by BATES number) contained the additional information?
2. I will run this by our forensic experts to see if they have any concerns.
3. Sounds good.

Best,
David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
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From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Tuesday, August 02, 2011 7:55 AM
To: 'coombs@armycourtmartialdefense.com'
Cc: Matthew kemkes; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA;
'paul.bouchard@us.army.mil'; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford,
Arthur D. WO1 USA JFHQ-NCR/MDW SJA; 'Joshua Tooman'
Subject: RE: [Suspected SPAM] RE: Update

David,

There are multiple media devices that other classified information was found on and I would prefer to wait until we have the final approvals for releasing classified information before identifying the exact items. All the information is inextricably commingled and I do not want to release potentially classified information without the proper authority and through an improper medium.

Ashden

From: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Sent: Tuesday, August 02, 2011 1:40 PM
To: Paul Bouchard
Cc: coombs@armycourtmartialdefense.com; edl@cyberagentsinc.com; Fein, Ashden CPT USA
JFHQ-NCR/MDW SJA; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA
Subject: RE: Message and update from CPT Bouchard (UNCLASSIFIED)
Signed By: arthur.ford@Jfhqncr.northcom.mil

Classification: UNCLASSIFIED

Caveats: FOUO

Sir,

No problem. I can't really give you an answer, because I don't want
commit the G2 to anything. I will let everyone know as soon as it is
approved. Thanks very much.

Chief

V/R,

Arthur Ford
WO1, JA
Legal Administrator
Comm: 202-685-1975
BB: 571-289-9690

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Tuesday, August 02, 2011 2:51 PM
To: coombs@armycourtmartialdefense.com
Cc: Matthew kemkes; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; paul.bouchard@us.army.mil; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; Joshua Tooman
Subject: Discovery Update (US v. PFC BM)

David,

We sent you and MAJ Kemkes the following today in discovery (BATES 36618-36802):

CID Case File Updates
FLAG Memo for Sec Army 15-6
SFC Adkins Reduction Board Appeal and Attachments
BM's newly executed Nondisclosure Agreement (NDA)

Your tracking number: 7010 1060 0001 1272 6251.

v/r
Ashden

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Tuesday, August 02, 2011 2:51 PM
To: 'coombs@armycourtmartialdefense.com'
Cc: Matthew kemkes; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA;
'paul.bouchard@us.army.mil'; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford,
Arthur D. WO1 USA JFHQ-NCR/MDW SJA; 'Joshua Tooman'
Subject: Discovery Update (US v. PFC BM)

David,

We sent you and MAJ Kemkes the following today in discovery (BATES 36618-36802):

CID Case File Updates
FLAG Memo for Sec Army 15-6
SFC Adkins Reduction Board Appeal and Attachments
BM's newly executed Nondisclosure Agreement (NDA)

Your tracking number: 7010 1060 0001 1272 6251.

v/r
Ashden

From: Paul Bouchard <bouchardp@yahoo.com>
Sent: Tuesday, August 2, 2011 3:39 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqnrc.northcom.mil>
Cc: edl@cyberagentsinc.com; coombs@armycourtmartialdefense.com
Subject: Fw: Forensic Laptop Hardware and Software
Attach: Eric Lakes CCE.vcf

Ashden:

Please read the below e-mail. It is from the Defense's computer forensics expert, Eric Lakes. It lists what he and Trent Struttmann (one of his employees) will need to do the computer forensics work.

If need be, maybe we can have a conference call -- me, you, and Eric -- to hash this out.

I read that the Government is considering the Fort Meade TDS Office as space for Mr. Lakes to do some of the work. We do have plenty of space here, so I think it will work.

Please let me know if there are any issues, concerns, etc., with the specs outlined by Mr. Lakes.

My Office number is 301-677-9231 and my cell phone is 915-603-7651.

Thanks,
Paul

From: Paul Bouchard <bouchardp@yahoo.com>
Sent: Tuesday, August 2, 2011 3:42 PM
To: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
<Arthur.Ford@jfhqncr.northcom.mil>
Cc: coombs@armycourtmartialdefense.com; edl@cyberagentsinc.com; Fein, Ashden CPT
USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>; Morrow III,
JoDean, CPT USA JFHQ-NCR/MDW SJA <JoDean.Morrow@jfhqncr.northcom.mil>
Subject: Re: Message and update from CPT Bouchard (UNCLASSIFIED)

Thanks, Chief.
Much appreciated. Our position is the sooner the better. Do keep me posted.

Thank you.

Respectfully,

CPT Bouchard

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Tuesday, August 02, 2011 3:43 PM
To: 'Paul Bouchard'
Cc: 'edl@cyberagentsinc.com'; 'coombs@armycourtmartialdefense.com'; Ford, Arthur D. WO1
Subject: USA JFHQ-NCR/MDW SJA
RE: Forensic Laptop Hardware and Software

Paul,

A conference call is best. Set a time and lets chat. I am available after 1600 today, all night, and most of tomorrow.

Ashden

From: Paul Bouchard <bouchardp@yahoo.com>
Sent: Tuesday, August 2, 2011 4:26 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqnrcr.northcom.mil>
Cc: edl@cyberagentsinc.com
Subject: Re: Forensic Laptop Hardware and Software

Ashden:

What's the best phone number to call you at?

Thanks,
Paul

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Tuesday, August 02, 2011 4:48 PM
To: 'Paul Bouchard'
Cc: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Subject: RE: Forensic Laptop Hardware and Software

202-685-4572 is my direct line. 202-685-1975 is the office.

From: Paul Bouchard <bouchardp@yahoo.com>
Sent: Tuesday, August 2, 2011 5:24 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqnqr.northcom.mil>
Cc: edl@cyberagentsinc.com
Subject: Re: Forensic Laptop Hardware and Software

CPT Fein, Mr. Lakes:

What is a good time for us to have a conference call tomorrow? My schedule is flexible.

V/R
CPT Bouchard

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Tuesday, August 02, 2011 5:25 PM
To: 'Paul Bouchard'
Cc: 'edl@cyberagentsinc.com'; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Subject: RE: Forensic Laptop Hardware and Software

How is 1300 EST?

From: Eric Lakes <edl@cyberagentsinc.com>
Sent: Tuesday, August 2, 2011 5:33 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>;
Paul Bouchard <bouchardp@yahoo.com>
Cc: edl@cyberagentsinc.com; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
<Arthur.Ford@jfhqncr.northcom.mil>
Subject: RE: Forensic Laptop Hardware and Software

That's good for me as well - call my cell number

Eric Lakes
Digital Forensic Examiner
Certified Computer Examiner (CCE)
Certified Homeland Security - III
MCSE, MCP+, MCP, Network Plus, A+
Cyber Agents, Inc.
<http://www.cyberagentsinc.com>
616 Pasadena Drive
Lexington, KY 40503
cell - 859.983.6655
land line - 859.523.9081 or 9082

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Tuesday, August 02, 2011 5:36 PM
To: 'edi@cyberagentsinc.com'; 'Paul Bouchard'
Cc: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Subject: RE: Forensic Laptop Hardware and Software

Paul,

Why don't you initiate and give us a call here at 202-685-1975.

From: Paul Bouchard <bouchardp@yahoo.com>
Sent: Tuesday, August 2, 2011 5:48 PM
To: Eric Lakes <edl@cyberagentsinc.com>
Cc: Ford, Arthur D. WO USA JFHQ-NCR/MDW SJA
<arthur.ford@jfhqncr.northcom.mil>; Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
<Ashden.Fein@jfhqncr.northcom.mil>
Subject: Re: Forensic Laptop Hardware and Software

Mr. Lakes:

I need Trent's date of birth and place of birth for his security clearance. Also, Trent can start filling out the form SF-86 as a hard copy so when he gets it in digits it'll be easier for him to complete. Lastly, we're planning a conference call with CPT Fein for tomorrow at 1300. Let me know if this works for you.

Thanks,
CPT Bouchard

From: coombs@armycourtmartialdefense.com
Sent: Tuesday, August 2, 2011 7:19 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: Matthew kemkes <matthew.kemkes@us.army.mil>; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA <JoDean.Morrow@jfhqncr.northcom.mil>; paul.bouchard@us.army.mil; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA <Angel.Overgaard@jfhqncr.northcom.mil>; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA <Arthur.Ford@jfhqncr.northcom.mil>; Joshua Tooman <joshua.tooman@us.army.mil>
Subject: [Suspected SPAM] RE: Discovery Update (US v. PFC BM)

Ashden,

Thank you for the update.

Best,
David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Office: 1-800-588-4156
Fax: (508) 689-9282
coombs@armycourtmartialdefense.com
www.armycourtmartialdefense.com

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From: Paul Bouchard <bouchardp@yahoo.com>
Sent: Wednesday, August 3, 2011 9:22 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: edl@cyberagentsinc.com
Subject: Re: Forensic Laptop Hardware and Software

Ashden and Eric.
Our conference call is slated for 1300 EST today.
I will call you both.
Best,
Paul

From: coombs@armycourtmartialdefense.com
Sent: Wednesday, August 3, 2011 9:51 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: Matthew kemkes <matthew.kemkes@us.army.mil>; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA <JoDean.Morrow@jfhqncr.northcom.mil>; paul.bouchard@us.army.mil; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA <Angel.Overgaard@jfhqncr.northcom.mil>; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA <Arthur.Ford@jfhqncr.northcom.mil>; Joshua Tooman <joshua.tooman@us.army.mil>
Subject: Security Experts

Ashden,

My security expert informs me that no laptops were provided to them during the 706 - only safes to store. I asked him how many laptops he would need, and he informed me that they would need three laptops to review information. Let me know if you have any questions.

Best,
David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Office: 1-800-588-4156
Fax: (508) 689-9282
coombs@armycourtmartialdefense.com
www.armycourtmartialdefense.com

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From: Paul Bouchard <bouchardp@yahoo.com>
Sent: Wednesday, August 3, 2011 11:35 AM
To: Eric Lakes <edl@cyberagentsinc.com>
Cc: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqnrc.northcom.mil>
Subject: Re: Forensic Laptop Hardware and Software

Ashden and Eric.

I will call you both at 1300 EST.

Below are the computer specs the Defense requires.

Thanks,
paul

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Wednesday, August 03, 2011 1:00 PM
To: Paul Bouchard; Eric Lakes
Subject: RE: Forensic Laptop Hardware and Software

Paul, I made it ontime. Please call when you can 202-685-4572.

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Wednesday, August 03, 2011 1:00 PM
To: coombs@armycourtmaritaldefense.com
Cc: Matthew kemkes; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; paul.bouchard@us.army.mil; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; Joshua Tooman
Subject: RE: Security Experts

Thank you.

From: Paul Bouchard <bouchardp@yahoo.com>
Sent: Wednesday, August 3, 2011 1:03 PM
To: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
<Arthur.Ford@jfhqncr.northcom.mil>
Cc: edl@cyberagentsinc.com; Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
<Ashden.Fein@jfhqncr.northcom.mil>
Subject: Re: Message and update from CPT Bouchard (UNCLASSIFIED)

CPT Fein and Chief Ford:

Trent Struttmann's date of birth is September 11, 1984, and his place of birth is Lexington, Kentucky.

V/R

CPT Bouchard

From: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA <arthur.ford@organization.com>
Sent: Wednesday, August 3, 2011 1:03 PM
To: 'bouchardp@yahoo.com'
Cc: 'edl@cyberagentsinc.com'; Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
<Ashden.Fein@jfhqncr.northcom.mil>
Subject: Re: Message and update from CPT Bouchard (UNCLASSIFIED)

Sir,

Thanks.

V/R,

WO1 Arthur Ford
Legal Administrator
202-685-1975
571-289-9690

From: Eric Lakes <edl@cyberagentsinc.com>
Sent: Wednesday, August 3, 2011 2:07 PM
To: 'Paul Bouchard' <bouchardp@yahoo.com>; coombs@armycourtmartialdefense.com; ts@cyberagentsinc.com
Cc: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Subject: RE: Message and update from CPT Bouchard (UNCLASSIFIED)
Attach: Eric Lakes CCE.vcf; Image (3).jpg; Image (4).jpg; Image (5).jpg; Image (6).jpg

SATA LapTop Hard Drives re:

SAMSUNG Spinpoint MP4 HM500UJ 500GB 7200 RPM 2.5" SATA 3.0Gb/s Internal Notebook Hard Drive -Bare Drive
Cache: 16MB
Average Latency: 4.13ms
Features: SATA Native Command Queuing Feature TuMR/PMR head with FOD technology Load/Unload Head Technology SilentSeek NoiseGuard
Parts #: 3 years limited
Model #: HM500UJ

Now: \$54.99

In some cases running a process from EnCase can take 8 or more hours before another process can be performed so we may have to have someone in the area where the computer/s are running until the process is done.

CAGE Code for Cyber Agents, Inc. 4BTY1



(2 - License of NetAnalysis) -
NetAnalysis v1.52 (Non-Dongle Version)
£190.00 each

(2 - VMWare Workstation) -

VMware Workstation 7.1

\$189.00 each

Electronic Software Download. Buy Now!

(2 - Live View Government) - free to Government

(2 - HstEx) - free

(2 - Snagit) - **Snagit License: \$49.95 USD each**

(2 - Mount Image Pro) - Purchase **Mount Image Pro v4**



QTY: each

(2 - MicroSoft Office PRO 2010 - Word, Excel, PowerPoint, Access, OutLook) - For a new PC preloaded with Microsoft Office 2010 Office 2010 Professional Product Key Card (no media)
System Requirements: Computer and processor: 500 MHz or faster processor Memory: 256 MB RAM, 512 MB recommended for graphics features, Outlook Instant Search, and certain advanced functionality.
1 Hard disk: 3.0 GB available disk space Display: 1024x576 or higher resolution monitor Operating system: Windows XP with Service Pack (SP) 3 (32-bit operating system (OS) only) or Windows

Features: Product Key, no Disc. For use with 1 new PC preloaded with Office 2010* (*Software download also available at www.office.com/productkeycard) Includes 2010 versions of Word, Excel, Powerpoint, OneNote, Outlook, Publisher and Access. Microsoft Office Professional 2010 gives you the tools to manage your business, connect with customers and organize your life. Access
Model #: 789-14834
Item #: N2E16832116859
Return Policy: Software Standard Return Policy

\$299.99 each

Adobe Acrobat X Pro



Full from

US \$449.00

(2 - Adobe Acrobat) -

each



From: Paul Bouchard [mailto:bouchardp@yahoo.com]
Sent: Wednesday, August 03, 2011 1:03 PM
To: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Cc: ed@cyberagentsinc.com; Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Subject: Re: Message and update from CPT Bouchard (UNCLASSIFIED)

CPT Fein and Chief Ford:

Trent Struttmann's date of birth is September 11, 1984, and his place of birth is Lexington, Kentucky.

V/R

CPT Bouchard

From: Paul Bouchard <bouchardp@yahoo.com>
To: "Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA" <Arthur.Ford@jfhqnrcr.northcom.mil>
Cc: coombs@armycourtmartialdefense.com; ed@cyberagentsinc.com; "Fein, Ashden CPT USA JFHQ-NCR/MDW SJA" <Ashden.Fein@jfhqnrcr.northcom.mil>; "Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA" <JoDean.Morrow@jfhqnrcr.northcom.mil>
Sent: Tuesday, August 2, 2011 3:42 PM
Subject: Re: Message and update from CPT Bouchard (UNCLASSIFIED)

Thanks, Chief.

Much appreciated. Our position is the sooner the better. Do keep me posted.

Thank you.

Respectfully,

CPT Bouchard

From: Paul Bouchard <bouchardp@yahoo.com>
Sent: Wednesday, August 3, 2011 2:23 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqnqr.northcom.mil>
Cc: edi@cyberagentsinc.com; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
<arthur.ford@jfhqnqr.northcom.mil>; Matthew kemkes
<matthew.kemkes@us.army.mil>; melissa.s.santiago@us.army.mil
Subject: Fw: Message from CPT Bouchard
Attach: Eric Lakes CCE.vcf; Image (3).jpg; Image (4).jpg; Image (5).jpg; Image (6).jpg

Mister Ford:

The attachments are the signed protective orders by Eric Lakes, one of the computer forensics experts for the Defense team in US v. Manning.
Respectfully,
CPT Bouchard

From: Paul Bouchard <bouchardp@yahoo.com>
Sent: Wednesday, August 3, 2011 2:26 PM
To: Eric Lakes <edl@cyberagentsinc.com>; coombs@armycourtmartialdefense.com; ts@cyberagentsinc.com
Cc: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Subject: Re: Message and update from CPT Bouchard (UNCLASSIFIED)

Ashden -- FYI:

What we talked about during our recent teleconference. I think Eric sent it to you previously; just ensuring you got it.

V/R

Paul

From: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Sent: Wednesday, August 03, 2011 2:34 PM
To: Matthew kemkes
Cc: coombs@armycourtmartialdefense.com; Bynoe, Lisa C; Morrow III, JoDean, CPT USA
JFHQ-NCR/MDW SJA; Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Subject: RE: Discovery (UNCLASSIFIED)
Signed By: arthur.ford@Jfhqncr.northcom.mil

Classification: UNCLASSIFIED

Caveats: FOUO

MAJ Kemkes,

I just received a call from CID, saying that the discovery disc I sent to you on 1 Jul was delivered on 26 Jul. Could you please confirm delivery, and let me know what condition the package was in? Thanks.

V/R,

Arthur Ford
WO1, JA
Legal Administrator
Comm: 202-685-1975
BB: 571-289-9690

From: Bynoe, Lisa C RES USA USARC [lisa.c.bynoe@us.army.mil]
Sent: Wednesday, August 03, 2011 2:35 PM
To: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; Matthew kemkes
Cc: coombs@armycourtmaritaldefense.com; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW
SJA; Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Subject: RE: Discovery (UNCLASSIFIED)
Signed By: lisa.c.bynoe@us.army.mil

Classification: UNCLASSIFIED

Caveats: FOUO

Sir,
The package was received and in good condition.

Respectfully,

Ms. Lisa Bynoe
TDS Paralegal
Trial Defense Services
204 Lee Ave, Suite B12
Fort Myer, VA 22211
703-696-6700
lisa.c.bynoe@us.army.mil

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Wednesday, August 03, 2011 3:43 PM
To: Eric Lakes; 'Paul Bouchard'; coombs@armycourtmartialdefense.com; ts@cyberagentsinc.com
Cc: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Subject: RE: Message and update from CPT Bouchard (UNCLASSIFIED)

Eric,

Thank you. How many hard drives?

Ashden

From: Eric Lakes <edl@cyberagentsinc.com>
Sent: Wednesday, August 3, 2011 4:16 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqnrc.northcom.mil>
Cc: 'Paul Bouchard' <bouchardp@yahoo.com>; coombs@armycourtmartialdefense.com
Subject: RE: Message and update from CPT Bouchard (UNCLASSIFIED)
Attach: Eric Lakes CCE.vcf

2 - one for each laptop

From: coombs@armycourtmartialdefense.com
Sent: Wednesday, August 3, 2011 5:10 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: Matthew kemkes <matthew.kemkes@us.army.mil>; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA <JoDean.Morrow@jfhqncr.northcom.mil>; paul.bouchard@us.army.mil; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA <Angel.Overgaard@jfhqncr.northcom.mil>; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA <Arthur.Ford@jfhqncr.northcom.mil>; Joshua Tooman <joshua.tooman@us.army.mil>
Subject: Expert Request
Attach: Dr. Grieger Request.pdf; Capt. Moore Email.pdf; Dr. Grieger Curriculum Vitae.pdf; Dr. Grieger Fee Schedule.pdf

Ashden,

Please see that attached expert request. Let me know if you have any questions based upon a review of the request and attachments.

Best,
David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Office: 1-800-588-4156
Fax: (508) 689-9282
coombs@armycourtmartialdefense.com
www.armycourtmartialdefense.com

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From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Wednesday, August 03, 2011 5:14 PM
To: coombs@armycourtmartialdefense.com
Cc: Matthew kemkes; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; paul.bouchard@us.army.mil; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; Joshua Tooman
Subject: RE: Expert Request

David,

Acknowledge receipt. Thank you and we will start working this immediately.

v/r
Ashden

From: coombs@armycourtmartialdefense.com
Sent: Thursday, August 4, 2011 4:22 PM
To: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
<Arthur.Ford@jfhqnrcr.northcom.mil>
Cc: Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA
<JoDean.Morrow@jfhqnrcr.northcom.mil>; Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqnrcr.northcom.mil>; Matthew kemkes
<matthew.kemkes@us.army.mil>; Paul Bouchard <bouchardp@yahoo.com>; Joshua Tooman <joshua.tooman@us.army.mil>
Subject: Discovery

Mr. Ford,

I just wanted to let you know that I received, and was able to open, the unclassified discovery disc 36618-36802.

Best,
David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Office: 1-800-588-4156
Fax: (508) 689-9282
coombs@armycourtmartialdefense.com
www.armycourtmartialdefense.com

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From: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Sent: Thursday, August 04, 2011 4:28 PM
To: 'coombs@armycourtmartialdefense.com'
Cc: Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Fein, Ashden CPT USA JFHQ-
NCR/MDW SJA; Matthew kemkes; Paul Bouchard; Joshua Tooman
Subject: RE: Discovery (UNCLASSIFIED)
Signed By: arthur.ford@Jfhqnrcr.northcom.mil

Classification: UNCLASSIFIED

Caveats: FOUO

Sir,

Thanks very much.

V/R,

Arthur Ford
WO1, JA
Legal Administrator
Comm: 202-685-1975
BB: 571-289-9690

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Thursday, August 04, 2011 4:37 PM
To: 'Paul Bouchard'; coombs@armycourtmarialdefense.com; ts@cyberagentsinc.com
Cc: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; Morrow III, JoDean, CPT USA JFHQ-
NCR/MDW SJA; Eric Lakes
Subject: RE: Message and update from CPT Bouchard (UNCLASSIFIED)
Attachments: purchase list for lakes.xlsx

David and Paul,

As you know, we received a list of items and software that Mr. Lakes contends are required for him to effectively assist you (see attached spreadsheet). We looked at these requirements, and vetted them through our expert to determine what software we can provide free of cost. Can you please send us a written request, with justification, that we can use to obtain approval from the CA for the expenditures, as none of this was discussed in your expert witness requests. Thank you.

v/r
Ashden

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Thursday, August 04, 2011 4:37 PM
To: 'Paul Bouchard'; 'coombs@armycourtmartialdefense.com'; 'ts@cyberagentsinc.com'
Cc: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; Morrow III, JoDean, CPT USA JFHQ-
NCR/MDW SJA; 'Eric Lakes'
Subject: RE: Message and update from CPT Bouchard (UNCLASSIFIED)
Attachments: purchase list for lakes.xlsx

David and Paul,

As you know, we received a list of items and software that Mr. Lakes contends are required for him to effectively assist you (see attached spreadsheet). We looked at these requirements, and vetted them through our expert to determine what software we can provide free of cost. Can you please send us a written request, with justification, that we can use to obtain approval from the CA for the expenditures, as none of this was discussed in your expert witness requests. Thank you.

v/r
Ashden

From: coombs@armycourtmartialdefense.com
Sent: Thursday, August 4, 2011 4:43 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
<Arthur.Ford@jfhqncr.northcom.mil>; Morrow III, JoDean, CPT USA JFHQ-
NCR/MDW SJA <JoDean.Morrow@jfhqncr.northcom.mil>; Eric Lakes
<edl@cyberagentsinc.com>; Paul Bouchard <bouchardp@yahoo.com>;
ts@cyberagentsinc.com
Subject: [Suspected SPAM] RE: Message and update from CPT Bouchard (UNCLASSIFIED)

Ashden,

Paul will submit a separate request, with justification, for the listed items in excel spreadsheet. Let us know if the government has any issues with the request once you receive it.

Best,
David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Office: 1-800-588-4156
Fax: (508) 689-9282
coombs@armycourtmartialdefense.com
www.armycourtmartialdefense.com

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From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Thursday, August 04, 2011 5:06 PM
To: 'coombs@armycourtmartialdefense.com'
Cc: Ford, Arthur D, WO1 USA JFHQ-NCR/MDW SJA; Morrow III, JoDean, CPT USA JFHQ-
NCR/MDW SJA; 'edl@cyberagentsinc.com'; 'bouchardp@yahoo.com';
'ts@cyberagentsinc.com'
Subject: Re: [Suspected SPAM] RE: Message and update from CPT Bouchard (UNCLASSIFIED)

Thanks.

From: Paul Bouchard <bouchardp@yahoo.com>
Sent: Thursday, August 4, 2011 6:26 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>; coombs@armycourtmartialdefense.com; ts@cyberagentsinc.com
Cc: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA <Arthur.Ford@jfhqncr.northcom.mil>; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA <JoDean.Morrow@jfhqncr.northcom.mil>; Eric Lakes <edl@cyberagentsinc.com>
Subject: Re: Message and update from CPT Bouchard (UNCLASSIFIED)

Roger. Thanks. I'll get on it.

Paul

From: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Sent: Thursday, August 04, 2011 7:25 PM
To: Tooman, Joshua J CPT MIL US USA TRADOC
Cc: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Subject: RE: Manning Discover Issues (UNCLASSIFIED)
Signed By: arthur.ford@Jfhqnrcr.northcom.mil

Classification: UNCLASSIFIED

Caveats: FOUO

Sir,

I'm looking at our files, and your request is confusing. Our files are bates stamped by file, and 21152 falls into the middle of a file. Can you please re-confirm the numbers of the actual files you cannot open? Also, not all of the files were encrypted, so you should be able to open some of them.

The discs I sent out have the numbers of the first and last file on the disc. Is this the disc that you have? Thanks.

V/R,

Arthur Ford
WO1, JA
Legal Administrator
Comm: 202-685-1975
BB: 571-289-9690

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Friday, August 05, 2011 7:24 AM
To: coombs@armycourtmartialdefense.com; MATTHEW KEMKES
(matthew.kemkes@us.army.mil)
Cc: Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-
NCR/MDW SJA
Subject: Correspondences between US and Defense

Gents,

Could you please ask all members of the defense to include me on all their emails to individual members of the prosecution, even administrative emails. I know most (on both sides) are not used to having to deal with so many people on different issues, but I would like to ensure we maintain proper C2 and redundancy, so that all the defense requests and issues may be adequately and efficiently resolved.

All members of the prosecution will include me on their emails as well.

Thank you.

v/r
Ashden

From: Tooman, Joshua J CPT MIL US USA TRADOC <joshua.tooman@us.army.mil>
Sent: Saturday, August 6, 2011 7:29 AM
To: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
<Arthur.Ford@jfhqncr.northcom.mil>
Cc: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>;
coombs@armycourtmartialdefense.com
Subject: Re: Manning Discover Issues (UNCLASSIFIED)

Mr. Ford

I was unable to open the disc labeled (12934-21152) and the files contained therein. Specifically, I know I was unable to open the files containing pages 013162 through 013781 and pages 019893 through 020152. I can get you a complete list on Tuesday.

Thanks and sorry for the confusion.
CPT Tooman

From: Paul Bouchard <bouchardp@yahoo.com>
Sent: Saturday, August 6, 2011 9:44 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: coombs@armycourtmaritaldefense.com; edl@cyberagentsinc.com
Subject: Defense Request for hardware and software
Attach: Request for hardware and software.pdf; Renewed Expert Request, PDF.pdf; Request for Expert Assistant for U S v PFC Manning.pdf; Hardware and software for US v. Manning.xlsx

Ashden,

Per our discussions, the Defense will need certain hardware equipment and software for Cyber Agents, Inc. to do its job. We're requesting that the Government provide these items -- see attachments.

Call or e-mail me if you have any questions.

Thanks,

Paul

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Saturday, August 06, 2011 7:33 PM
To: Paul Bouchard
Cc: coombs@armycourtmartialdefense.com; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA;
Subject: Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA
RE: Defense Request for hardware and software

Paul,

Thank you. We will review these requests this weekend and get back to you by Tuesday on any issues, such as the request should be for the SPCMCA since he owns the case and not the GCMCA.

In order not to have any unnecessary delay, please provide us, ASAP, whatever research you have that shows the convening authority can appoint a Corporation/Company as an expert assistant (along with all its employees) vice only appointing individuals within the Corporation/Company. We have not found a case on point.

Have a good weekend.

v/r
Ashden

From: Paul Bouchard <bouchardp@yahoo.com>
Sent: Saturday, August 6, 2011 9:06 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqnqr.northcom.mil>
Subject: Re: Defense Request for hardware and software

Okay.
Thanks,
Paul

From: Paul Bouchard <bouchardp@yahoo.com>
Sent: Sunday, August 7, 2011 10:14 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: coombs@armycourtmartialdefense.com
Subject: Re: Defense Request for hardware and software

Ashden:

Do you really need legal precedent cited in order to appoint Cyber Agents, Inc. and its employees? Reason I ask is, is there any prohibition requesting a corporation as a defense expert assistant? The Government contracts with companies all the time.

Not trying to be a pain for you; just want to know.

Please advise. I'm sure we'll work it out.

Thanks,

Paul

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Sunday, August 07, 2011 10:30 PM
To: 'Paul Bouchard'
Cc: 'coombs@armycourtmartialdefense.com'; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW
SJA
Subject: RE: Defense Request for hardware and software

Paul,

We do need some legal precedent to accomplish this request. I absolutely agree that corporations and companies are billed for expert assistance / witnesses; however we did not find any case law that supports the proposition that an entire corporation and all its employees can be appointed to the defense team as expert assistants. We consider the prohibition to exist in the plain language of the rule, which identifies a person and their qualifications and not a corporation.

We are still reviewing the request to ensure all the requirements are met, specifically the fee schedule is clearly outlined.

v/r
Ashden

From: Paul Bouchard <bouchardp@yahoo.com>
Sent: Monday, August 8, 2011 7:37 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqnqr.northcom.mil>
Cc: coombs@armycourtmartialdefense.com
Subject: Re: Defense Request for hardware and software

Ashden:

What if I just submit a separate expert request for the appointment of Trent Struttmann as an additional defense expert?

I'm sure that the government has had multiple computer forensic experts at CCIU working on this case. Given the amount of information (8 terabytes) and the scope of work, the defense will need the services of an additional representative from Cyber Agents. This additional expert is needed in order to perform the review required in this case, and to avoid any unnecessarily lengthy delays due to the amount of information required to be reviewed.

Please let me know.

Thanks,

Paul

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Monday, August 08, 2011 7:43 AM
To: 'Paul Bouchard'
Cc: 'coombs@armycourtmartialdefense.com'; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA;
Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA
Subject: RE: Defense Request for hardware and software

Paul,

At this point, we have no objection to multiple expert assistants to further assist Eric Lakes and anyone else the defense requests. The only issue is whether the convening authority has the power/authority to appoint a company/corporation vice individual employees. We are already working an additional appointment of Trent S along with a reappointment of Eric L.

By the end of today, I will provide you an email with a list of the other information we will either need or recommend changed before we take the request to the SPCMCA.

v/r
Ashden

From: Paul Bouchard <bouchardp@yahoo.com>
Sent: Monday, August 8, 2011 8:29 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: coombs@armycourtmartialdefense.com; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW
SJA <Arthur.Ford@jfhqncr.northcom.mil>; Overgaard, Angel M. CPT USA JFHQ-
NCR/MDW SJA <Angel.Overgaard@jfhqncr.northcom.mil>
Subject: Re: Defense Request for hardware and software

Okay.
Thanks,
Paul

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Tuesday, August 09, 2011 8:15 AM
To: Paul Bouchard; 'Bouchard, Paul R CPT MIL USA OSA'
Cc: coombs@armycourtmaritaldefense.com; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA;
Subject: Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA
RE: Defense Request for hardware and software

Paul,

Please see below. If you can send this today we will get it to the convening authority in the next 48 hours.

1. The request should be "to" the Garrison Commander (COL Coffman), not to the CG. The SPCMCA currently owns the case.
2. The subject states that the request is for additional funding, but the request is also to appoint a new defense expert and reappoint Mr. Lakes.
3. Please name the requested experts IAW RCM 703(d). The request does not request a specific expert; it requests a corporation and its employees.
4. The request needs to layout the EXACT fee schedule and other expenses. Currently, the request says that defense needs "\$2,400.00 in additionally [sic] funding to evaluate the data" and "The possibility of additionally [sic] funding at the rate of \$175 per hour for further computer analysis if need be." It is unclear whether the \$2400 is for estimated work which would be billed at \$175/hour or just an additional flat rate. Please provide a concise billing rate and then an estimate of what the initial # of days will cost. We will be able to take this amount to the convening authority and argue that initial cost to be approved. Additionally, without a concise and clear billing schedule, we will not be able to get a contract setup through Contracting.

v/r
Ashden

From: Paul Bouchard <bouchardp@yahoo.com>
Sent: Tuesday, August 9, 2011 8:59 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>; Bouchard, Paul R CPT MIL USA OSA <paul.r.bouchard@us.army.mil>
Cc: coombs@armycourtmartialdefense.com; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA <Arthur.Ford@jfhqncr.northcom.mil>; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA <Angel.Overgaard@jfhqncr.northcom.mil>; edl@cyberagentsinc.com
Subject: Re: Defense Request for hardware and software

CPT Fein:

It was good talking to you over the phone. I will get this to you today -- will confirm with Eric Lakes. As we discussed, better we start from scratch and forget that more than a year ago, Eric Lakes was approved for \$5,600.00. Given the volume of data involved in the case, Eric then asked for more money and also the help of one of his employees. Bottom line: Best we start from scratch, especially given that it's a new convening authority as compared to July of last year.

Again, I'll have this product to you today.

V/R

CPT Bouchard

From: coombs@armycourtmartialdefense.com
Sent: Tuesday, August 9, 2011 9:10 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
<Arthur.Ford@jfhqncr.northcom.mil>; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA
<Angel.Overgaard@jfhqncr.northcom.mil>; Paul Bouchard
<bouchardp@yahoo.com>; Bouchard, Paul R CPT MIL USA OSA
<paul.r.bouchard@us.army.mil>
Subject: [Suspected SPAM] RE: Defense Request for hardware and software

Ashden,

Any update on the request for Dr. Grieger? Thanks.

Best,
David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Toll Free: 1-800-588-4156
Local: (508) 689-4616
Fax: (508) 689-9282
coombs@armycourtmartialdefense.com
www.armycourtmartialdefense.com

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From: Paul Bouchard <bouchardp@yahoo.com>
Sent: Tuesday, August 9, 2011 11:43 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>;
edl@cyberagentsinc.com
Cc: coombs@armycourtmartialdefense.com
Subject: Re: Defense Request for hardware and software

Ashden:

The attachment is our new request. I haven't signed it yet -- would like you to see it first. Pretty simple -- we're asking for Eric and Trent, they bill at \$175.00 per hour per person; they estimate the work to take five days at a cost of \$14,000.00 excluding travel costs.

I have COL Coffman as the SPCCMCA. Is that the correct spelling of his name? Do I need to have his first name?

Let me know what you think. Once finalized, I'll sign and send the final version to you.

Thanks,
Paul

From: Eric Lakes <edl@cyberagentsinc.com>
Sent: Tuesday, August 9, 2011 11:48 AM
To: 'Paul Bouchard' <bouchardp@yahoo.com>; Fein, Ashden CPT USA JFHQ-NCR/MDW
SJA <Ashden.Fein@jfhqnrc.northcom.mil>
Cc: coombs@armycourtmartialdefense.com
Subject: RE: Defense Request for hardware and software
Attach: Eric Lakes CCE.vcf

No attachment in this email but:

Don't forget the non-transferrable software and the hard drives previously discussed

Eric Lakes, CCE
Cyber Agents, Inc.
Digital Forensic Examiner
(859) 523-9081 or (859) 523-9082 ext. 1
(859) 983-6655 fax:
ed@cyberagentsinc.com
616 Pasadena Drive
Lexington, KY 40503
<http://www.cyberagentsinc.com>

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Tuesday, August 09, 2011 12:23 PM
To: Paul Bouchard; edi@cyberagentsinc.com
Cc: coombs@armycourtmartialdefense.com
Subject: RE: Defense Request for hardware and software

No attachments.

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Tuesday, August 09, 2011 12:34 PM
To: coombs@armycourtmaritaldefense.com
Cc: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Paul Bouchard; Bouchard, Paul R CPT MIL USA OSA
Subject: RE: [Suspected SPAM] RE: Defense Request for hardware and software

David,

We are working this request along with CyberAgents. My intent is to present both to the convening authority. Last time we used Dr. Moore because you found him. Have you explored any other options for experts other than Dr. Grieger?

Thanks.

v/r
Ashden

From: Paul Bouchard <bouchardp@yahoo.com>
Sent: Tuesday, August 9, 2011 1:05 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>;
edl@cyberagentsinc.com
Cc: coombs@armycourtmartialdefense.com
Subject: Re: Defense Request for hardware and software
Attach: Request for Computer Expert Assistant, US v. Manning, FINAL.doc

Ashden et al. Sorry about forgetting to attach the document. Here it is.

Paul

From: coombs@armycourtmartialdefense.com
Sent: Tuesday, August 9, 2011 1:31 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
<Arthur.Ford@jfhqncr.northcom.mil>; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA
<Angel.Overgaard@jfhqncr.northcom.mil>; Matthew kemkes
<matthew.kemkes@us.army.mil>; Bouchard, Paul R CPT MIL USA OSA
<paul.r.bouchard@us.army.mil>
Subject: RE: [Suspected SPAM] RE: Defense Request for hardware and software

Ashden,

Yes, I explored other options with Dr. Jehle. My preference was to find someone in the Leavenworth area that could more easily work with him and BM. However, there was no one available.

As mentioned in the expert request, the main concern of the defense is that any expert is responsive and has adequate time to devote to the case. Given our track record so far with government employees, it seems that the better course is to find someone that is being paid for his time (versus adding to his daily duties). My guess is that an expert who charges by the hour will not cite other work conflicts as a reason to disengage.

Best,

David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Toll Free: 1-800-588-4156
Local: (508) 689-4616
Fax: (508) 689-9282
coombs@armycourtmartialdefense.com
www.armycourtmartialdefense.com

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From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Tuesday, August 09, 2011 1:58 PM
To: coombs@armycourtmartialdefense.com
Cc: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; Overgaard, Angel M. CPT USA JFHQ-
NCR/MDW SJA; Matthew kemkes; Bouchard,Paul R CPT MIL USA OSA
Subject: RE: [Suspected SPAM] RE: Defense Request for hardware and software

Thank you.

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Tuesday, August 09, 2011 2:34 PM
To: 'Paul Bouchard'; 'edi@cyberagentsinc.com'
Cc: 'coombs@armycourtmartialdefense.com'; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW
SJA
Subject: RE: Defense Request for hardware and software

Paul,

Overall- no issues. Some recommendations:
Changing THRU to Trial Counsel and not SJA. Also, in reference to paragraph 3c, we (counsel for the United States) recommend this COA and you seem to support it along with your experts, this decision is ultimately up to the convening authority. We are going to make this recommendation to the convening authority along with providing him guidance from an IA expert.

Once you send a signed copy, we should be good to go.

Thanks.

Ashden

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Tuesday, August 09, 2011 3:19 PM
To: 'coombs@armycourtmartialdefense.com'
Cc: Matthew kemkes; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA;
'paul.bouchard@us.army.mil'; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford,
Arthur D. WO1 USA JFHQ-NCR/MDW SJA; 'Joshua Tooman'
Subject: Discovery Update (US v. PFC BM)

David,

We sent you and MAJ Kemkes the following today in discovery (BATES 036803):

Quantico Brig Recordings

Your tracking number: 7010 1060 0001 1272 6268

v/r
Ashden

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Tuesday, August 09, 2011 3:19 PM
To: 'coombs@armycourtmartialdefense.com'
Cc: Matthew kemkes; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA;
'paul.bouchard@us.army.mil'; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford,
Arthur D. WO1 USA JFHQ-NCR/MDW SJA; 'Joshua Tooman'
Subject: Discovery Update (US v. PFC BM)

David,

We sent you and MAJ Kemkes the following today in discovery (BATES 036803):

Quantico Brig Recordings

Your tracking number: 7010 1060 0001 1272 6268

v/r
Ashden

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Tuesday, August 09, 2011 3:25 PM
To: Paul Bouchard
Subject: FOR....

Commander, U.S. Army Garrison, Joint Base Myer - Henderson Hall, 204 Lee Avenue, Fort Myer, VA 22211-1199

From: Tooman, Joshua J CPT MIL US USA TRADOC [joshua.tooman@us.army.mil]
Sent: Tuesday, August 09, 2011 4:28 PM
To: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Cc: coombs@armycourtmartialdefense.com; Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Subject: RE: Manning Discover Issues (UNCLASSIFIED)
Signed By: joshua.tooman@us.army.mil

Classification: UNCLASSIFIED

Caveats: FOUO

Mr. Ford

I am unable to open the following files, all of which are what is labeled as "Disc 1":

012934-012934
012935-013161
013162-013661
013662-014161
014162-014661
014662-015161
015162-015661
015662-016161
016162-016661
016662-017161
017162-017661
017662-018161
018162-019661
019662-020152

Each attempt to open one of these files was met with the following error: "A digital ID was used to encrypt this document but no digital ID is present to decrypt it. Make sure your digital ID is properly installed or contact the document author."

Do you have any thoughts on what the hang up may be?

Thanks,
CPT Tooman

From: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Sent: Tuesday, August 09, 2011 4:39 PM
To: Tooman, Joshua J CPT MIL US USA TRADOC
Cc: coombs@armycourtmaritaldefense.com; Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Subject: RE: Manning Discover Issues (UNCLASSIFIED)
Signed By: arthur.ford@Jfhqnrcr.northcom.mil

Classification: UNCLASSIFIED

Caveats: FOUO

Sir,

The problem is with encryption. Those documents are encrypted with your CAC certificate. We have re-encrypted them with the certificate that you sent with your latest emails, and re-sent them to you yesterday. Please let me know if you receive them. Thanks, Sir.

V/R,

Arthur Ford
WO1, JA
Legal Administrator
Comm: 202-685-1975
BB: 571-289-9690

From: Tooman, Joshua J CPT MIL US USA TRADOC [joshua.tooman@us.army.mil]
Sent: Tuesday, August 09, 2011 4:41 PM
To: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Cc: coombs@armycourtmarialdefense.com; Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Subject: RE: Manning Discover Issues (UNCLASSIFIED)
Signed By: joshua.tooman@us.army.mil

Classification: UNCLASSIFIED

Caveats: FOUO

Excellent. Thanks for your help!

v/r
CPT Tooman

From: Paul Bouchard <bouchardp@yahoo.com>
Sent: Tuesday, August 9, 2011 5:35 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: coombs@armycourtmartialdefense.com; edl@cyberagentsinc.com
Subject: Defense request for Computer Forensics Experts
Attach: Request for Eric and Trent, FINAL.pdf

Ashden:

The attachment is our request for Eric and Trent.

Thanks,

Paul

From: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Sent: Wednesday, August 10, 2011 10:40 AM
To: David Coombs (coombs@armycourtmarialdefense.com); joshua.tooman@us.army.mil; Matthew kemkes; paul. bouchard (paul.r.bouchard@us.army.mil); 'melissa.s.santiago@us.army.mil'; 'Cherise.m.purcell@us.army.mil'
Cc: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA; Morrow III, JoDean, CPT USA JFHQ- NCR/MDW SJA
Subject: Protective order for 10SW576 (UNCLASSIFIED)
Attachments: 10SW576.pdf
Signed By: arthur.ford@Jfhqnrcr.northcom.mil

Classification: UNCLASSIFIED

Caveats: FOUO

Everyone,

Attached is the disclosure and protective order for search warrant 10SW576. Please print, sign each page, and scan and send back to me. Thank you very much.

V/R,

Arthur Ford

WO1, JA

Legal Administrator

Comm: 202-685-1975

BB: 571-289-9698

From: coombs@armycourtmartialdefense.com
Sent: Wednesday, August 10, 2011 11:48 AM
To: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
<Arthur.Ford@jfhqncr.northcom.mil>
Cc: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>;
Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA
<JoDean.Morrow@jfhqncr.northcom.mil>; joshua.tooman@us.army.mil; Matthew
kemkes <matthew.kemkes@us.army.mil>; paul.r.bouchard@us.army.mil;
melissa.s.santiago@us.army.mil; Cherise.m.purcell@us.army.mil
Subject: RE: Protective order for 10SW576 (UNCLASSIFIED)
Attach: 110SW576 Protective Order.pdf

Mr. Ford,

Here is the requested protective order.

Best,
David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Toll Free: 1-800-588-4156
Local: (508) 689-4616
Fax: (508) 689-9282
coombs@armycourtmartialdefense.com
www.armycourtmartialdefense.com

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From: Tooman, Joshua J CPT MIL US USA TRADOC [joshua.tooman@us.army.mil]
Sent: Wednesday, August 10, 2011 3:28 PM
To: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; coombs@armycourtmartialdefense.com; Matthew kemkes; paul.r.bouchard@us.army.mil; Santiago, Melissa S CW2 RES USA; Purcell, Cherise M SSG RES USA
Cc: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA
Subject: RE: Protective order for 10SW576 (UNCLASSIFIED)
Attachments: Search_Warrant_PO.pdf
Signed By: joshua.tooman@us.army.mil

Classification: UNCLASSIFIED

Caveats: FOUO

Mr. Ford

The requested protective order is attached.

Thanks,
CPT Tooman

From: Paul Bouchard <bouchardp@yahoo.com>
Sent: Thursday, August 11, 2011 9:23 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Subject: Message from CPT Paul Bouchard

Ashden:

Keep me in the loop vis-a-vis Eric and Trents' acceptance and security clearances, hardware and software, and protective orders.

Thanks,
Best,
Paul

From: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA <arthur.ford@organization.com>
Sent: Thursday, August 11, 2011 11:46 AM
To: 'paul.r.bouchard@us.army.mil'; Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
<Ashden.Fein@jfhqncr.northcom.mil>
Subject: Re: Protective order for 10SW576 (UNCLASSIFIED)

Sir.

Message received. I don't see any reason for them to sign the po. Thanks.

V/R.

WO1 Arthur Ford
Legal Administrator
202-685-1975
571-289-9690

From: Tooman, Joshua J CPT MIL US USA TRADOC [joshua.tooman@us.army.mil]
Sent: Thursday, August 11, 2011 8:29 PM
To: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Cc: coombs@armycourtmarialdefense.com; Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Subject: Disc Received (UNCLASSIFIED)
Signed By: joshua.tooman@us.army.mil

Follow Up Flag: Follow up
Flag Status: Completed

Classification: UNCLASSIFIED

Caveats: FOUO

Mr. Ford

I received the disc that you sent and was able to open the files without issue. Thank you. Just as a heads up, a number of files were on the original disc, but NOT on the disc that you sent this week. As such, I do not have functioning copies of the following files:

012934-012934
012935-013161
014162-014661
014662-015161
015162-015661
015662-016161
016162-016661
016662-017161
017162-017661
017662-018161
018162-019661

v/r
CPT Tooman

CPT Joshua J. Tooman
Defense Counsel
U.S. Army Trial Defense Service
415 Custer Avenue
Fort Leavenworth, Kansas 66027
Phone: (913) 684-1866
Fax: (913) 684-1863
DSN - 552-1866

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Classification: UNCLASSIFIED
Caveats: FOUO

From: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA <arthur.ford@organization.com>
Sent: Thursday, August 11, 2011 7:26 PM
To: 'joshua.tooman@us.army.mil'
Cc: 'coombs@armycourtmartialdefense.com'; Fein, Ashden CPT USA JFHQ-NCR/MDW
SJA <Ashden.Fein@jfhqnqr.northcom.mil>
Subject: Re: Disc Received (UNCLASSIFIED)

Sir.

Thank you for letting me know. I will take care of it as soon as I can.

V/R,

WO1 Arthur Ford
Legal Administrator
202-685-1975
571-289-9690

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Thursday, August 11, 2011 10:10 PM
To: 'coombsb@armycourtmartialdefense.com'
Cc: Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; 'joshua.tooman@us.army.mil'; Matthew kemkes; 'paul.r.bouchard@us.army.mil'; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Subject: US v. PFC BM Updates
Attachments: 11-Aug-10-SPCMCA Appointment of Forensic Computer Expert (ManningB).pdf; 11-Aug-10-SPCMCA Approval Defense Expert Forensic Psychiatry LCDR Moulton (ManningB).pdf; 11-Aug-10-SPCMCA Approval for Defense Computer Hardware (ManningB).pdf; 11-Aug-10-Approved Facility and Storage for Classified Information (ManningB).pdf; 11-Aug-10-Excludable Delay Memorandum (ManningB).pdf

Importance: High

David,

Attached are the following five actions from the SPCMCA:

1. Appointment of Forensic Computer Experts
2. Approval for Defense Computer Hardware
3. Appointment of Expert Forensic Psychiatrist
4. Approved Facility and Storage of Classified Information
5. Excludable Delay Memorandum

LCDR Moulton may be reached at David.Moulton@med.navny.mil or navyshrink@mac.com or cell (240) 246-4201.

Additionally, we sent unclassified discovery (BATES: 036804-042806) today which includes MAJ Clausen's Adverse Action. (Tracking # 7010 1060 0001 1272 6275)

v/r
Ashden

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Friday, August 12, 2011 7:09 AM
To: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; 'paul.r.bouchard@us.army.mil'
Cc: 'coombs@armycourtmartialdefense.com'
Subject: RE: Protective order for 10SW578 (UNCLASSIFIED)

I agree with Mr. Ford, with one caveat- if you ever intend to share ANY of the information with Lakes or Struttmann, then they are required to sign the protective orders.

From: coombs@armycourtmartialdefense.com
Sent: Friday, August 12, 2011 8:05 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Subject: CA Actions

Ashden,

Can you resend the CA actions that you sent to me last night? When I attempt to open the message, I receive an error message. Thanks.

Best,
David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Toll Free: 1-800-588-4156
Local: (508) 689-4616
Fax: (508) 689-9282
coombs@armycourtmartialdefense.com
www.armycourtmartialdefense.com

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From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Friday, August 12, 2011 8:07 AM
To: 'coombs@armycourtmartialdefense.com'
Subject: Re: CA Actions

I will resend later this morning. I am out of the office but will be back in a little back.

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Friday, August 12, 2011 8:36 AM
To: coombs@armycourtmartialdefense.com
Subject: FW: US v. PFC BM Updates
Attachments: 11-Aug-10-Excludable Delay Memorandum (ManningB).pdf; 11-Aug-10-Approved Facility and Storage for Classified Information (ManningB).pdf; 11-Aug-10-SPCMCA Approval for Defense Computer Hardware (ManningB).pdf; 11-Aug-10-SPCMCA Approval Defense Expert Forensic Psychiatry LCDR Moulton (ManningB).pdf; 11-Aug-10-SPCMCA Appointment of Forensic Computer Expert (ManningB).pdf
Importance: High

Resend. Please confirm receipt.

From: coombs@armycourtmartialdefense.com
Sent: Friday, August 12, 2011 9:04 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqnqr.northcom.mil>
Subject: RE: FW: US v. PFC BM Updates

Thank you.

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Toll Free: 1-800-588-4156
Local: (508) 689-4616
Fax: (508) 689-9282
coombs@armycourtmartialdefense.com
www.armycourtmartialdefense.com

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From: Bouchard, Paul R CPT MIL USA OSA <paul.r.bouchard@us.army.mil>
Sent: Friday, August 12, 2011 10:18 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
<Arthur.Ford@jfhqncr.northcom.mil>; coombs@armycourtmartialdefense.com
Subject: Re: RE: Protective order for 10SW576 (UNCLASSIFIED)

Ashden:
Roger.
Thanks.
Paul

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Friday, August 12, 2011 4:51 PM
To: Rains, Larry E Mr CIV USA DCS G-2
Cc: 'edl@cyberagentsinc.com'; 'ts@cyberagentsinc.com'; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; 'Jordan, Charles R Mr CIV USA DCS G-2'
Subject: RE: (U) RE: (UNCLASSIFIED)

Mr. Rains,

For Trent Struttman's clearance, his email is ts@cyberagentsinc.com.

Thank you.

v/r
CPT Fein

From: Rains, Larry E Mr CIV USA DCS G-2 [larry.rains@us.army.mil]
Sent: Friday, August 12, 2011 5:04 PM
To: ts@cyberagentsinc.com
Cc: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA; Jordan, Charles R Mr CIV USA DCS G-2
Subject: (U) Security Clearance
Signed By: larry.rains@us.army.mil

Classification: UNCLASSIFIED//FOR OFFICIAL USE ONLY

Mr. Struttmann,

I am the Security Manager for ODCS, G-2 and have been asked to submit you for a Secret level Security Clearance.

To assist me in initiating the investigation, please complete the information below and return to me at your earliest convenience.

Full Name:

City and State of birth:

Work Ph#:

Secondary Ph#: (i.e. Cell ph)

Primary email:

Secondary email:

The Army G-2 is participating in the Army Investigative Enterprise System Program which expedites the processing of PSI's (Personnel Security Investigations) via the PSI Center of Excellence (PSI-CoE). Within a few days, you will receive an email from the PSI-COE with a link to eQip and instructions for completing the SF-86 online. If you have any questions, please call PSI-CoE call center at 410-278-4194 or DSN 298-4194.

P.S. You must have your fingerprints taken and submitted electronically to OPM within 30 days. Sooner, the better. You can have fingerprints taken at the Pentagon if this location is accessible for you. Please call 703-697-9327 to schedule.

Best regards,
Larry

Larry Rains
Security Manager/SSR
HQDA, ODCS, G-2
1000 Army Pentagon
Washington DC 20310-1000
Comm: 703-695-1125
Fax: 703-695-2648

Classification: UNCLASSIFIED//FOR OFFICIAL USE ONLY

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Friday, August 12, 2011 5:23 PM
To: 'paul.r.bouchard@us.army.mil'; 'coombe@armycourtmartialdefense.com'
Cc: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Subject: FW: (U) Security Clearance

Gents. FYSA.

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Saturday, August 13, 2011 6:20 PM
To: 'paul.r.bouchard@us.army.mil'
Cc: 'coombs@armycourtmartialdefense.com'; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Subject: Struttmann's Clearance

Paul,

Trent S. has an investigation request open. He should have received instructions that direct him to input his SF86 information into eQIP through the OPM website. Once he completes that, signs the document, and sends in his fingerprints, we should be able to process everything VERY quickly. Please let us know when those steps are completed so we can move quickly on our end. Thanks and have a good weekend.

v/r
Ashden

From: Bouchard, Paul R CPT MIL USA OSA <paul.r.bouchard@us.army.mil>
Sent: Sunday, August 14, 2011 5:47 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqnrc.northcom.mil>
Cc: coombs@armycourtmartialdefense.com; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW
SJA <Arthur.Ford@jfhqnrc.northcom.mil>
Subject: Re: FW: (U) Security Clearance

Trent:
Please read below and follow instructions. This is for your security clearance.
Looking forward to working with you and Eric.
Best,
Paul

From: Bouchard, Paul R CPT MIL USA OSA <paul.r.bouchard@us.army.mil>
Sent: Sunday, August 14, 2011 5:49 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: coombs@armycourtmartialdefense.com; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW
SJA <Arthur.Ford@jfhqncr.northcom.mil>
Subject: Re: Struttmann's Clearance

Trent:

Please read below and comply.

Ashden - Many thanks.

V/R

Paul

From: PSIP Center of Excellence <psip@conus.army.mil>
Sent: Monday, August 15, 2011 9:01 AM
To: trent.struttmann@gmail.com; ts@cyberagentsinc.com
Cc: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <ashden.fein@jfhqncr.northcom.mil>; larry.rains@us.army.mil; charles.r.jordan@us.army.mil
Subject: Applicant Action Required, Investigation Application Instructions, PSIP Record Number CLR00000157377
Attach: eQIP User Instructions YOU MUST READ ME.pdf, Section_21_Guidance.pdf

Mr. TRENT GREGORY STRUTTMANN:

The Personnel Security Investigation Center of Excellence (PSI-CoE) has received a request to begin processing your investigation application. The attachment provides detailed instructions to assist you with completing this process. It is highly recommended that you read these instructions before you begin completing the e-QIP form.

Once you have completed the e-QIP form, you must release it to the PSI-CoE for review. If the form contains errors or is missing required information, it will be returned to you via email for correction. Please ensure that you are monitoring your email throughout this process.

The following must be received within five (5) calendar days.

- e-QIP forms
- Signed Signature Release Pages
- Fingerprints
- 306 and/or Resume (when required)

To get started:

1. Access the e-QIP form at: www.opm.gov/e-qip/

To initially access the e-QIP form you must authenticate your identity. When Question 2 asks for your city of birth use the following spelling: LEXINGTON.

2. Contact your local security office or hiring official to make arrangements to be fingerprinted.

AR 380-67 states that "failure to respond within the time limit prescribed by the requesting organization with the required security forms or refusal to provide or permit access to the relevant information required by this regulation shall result in termination of the individual's security investigation or assignment to sensitive duties utilizing the procedures of paragraph 8-201 or further administrative processing of investigative requirement." Failure to meet this suspense will result in notification to your chain of command.

If you no longer require a background investigation or you cannot comply with these instructions, please have your security manager or hiring official contact the PSI-CoE.

If you have any questions, please call 410-278-4194 or DSN 298-4194 or email us at imneapgesi5@conus.army.mil. The PSI-CoE call center is open between the hours of 0600 and 2400 Monday through Friday. All times are EST.

Documentation required for this investigation request may be faxed to 410-306-3858 or DSN 458-3858 or scanned and e-mailed to imneapgesi@conus.army.mil.

Please do not respond to this email, as responses are not monitored.

PSIP Record Number: CLR00000157377
Email Code: PSIP-0002-FP

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Monday, August 15, 2011 9:10 AM
To: 'paul.r.bouchard@us.army.mil'; 'coombs@armycourtmartialdefense.com'
Cc: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Subject: FW: Applicant Action Required, Investigation Application Instructions, PSIP Record Number CLR000000157377
Attachments: eQIP User Instructions YOU MUST READ ME.pdf; Section_21_Guidance.pdf

FYSA.

From: coombs@armycourtmartialdefense.com
Sent: Monday, August 15, 2011 1:50 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>;
Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
<Arthur.Ford@jfhqncr.northcom.mil>
Cc: Matthew kemkes <matthew.kemkes@us.army.mil>; Paul Bouchard
<bouchardp@yahoo.com>; Joshua Tooman <joshua.tooman@us.army.mil>
Subject: Dr. Moulton

Ashden,

Who does Dr. Moulton need to coordinate with in order to obtain travel orders? I believe that MDW should be providing the funding for his TDY. If this is not correct, can you point us in the right direction?
Thanks.

Best,
David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Toll Free: 1-800-588-4156
Local: (508) 689-4616
Fax: (508) 689-9282
coombs@armycourtmartialdefense.com
www.armycourtmartialdefense.com

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From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Monday, August 15, 2011 1:53 PM
To: 'coombs@armycourtmartialdefense.com'; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Cc: Matthew kemkes; 'Paul Bouchard'; 'Joshua Tooman'
Subject: RE: Dr. Moulton

David,

We will figure out the process immediately. Please have Dr. Moulton send us his DTS POC so we can coordinate the exchanges.

V/r
Ashden

From: coombs@armycourtmartialdefense.com
Sent: Monday, August 15, 2011 6:39 PM
To: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
<Arthur.Ford@jfhqncr.northcom.mil>
Cc: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>;
Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA
<JoDean.Morrow@jfhqncr.northcom.mil>; joshua.tooman@us.army.mil; Matthew
kemkes <matthew.kemkes@us.army.mil>; paul.r.bouchard@us.army.mil;
melissa.s.santiago@us.army.mil; Cherise.m.purcell@us.army.mil
Subject: [Suspected SPAM] Discovery

Mr. Ford,

Yester, I was received three discs labled 036803 - 036803 and opened each without incident. Today, I received the single disc labled 036804 through 042806, but cannot access any of the documents.

When I load the disc, it reads the various files (this takes around two minutes to do as compared to previous discs that only took seconds). After being able to see the contents, I then attempt to open one of the files. The file takes a long time to upload (around five minutes). After uploading, I am then prompted for the password. Once I enter the password, the file starts to download to my computer. Unfortunately, after about ten minutes, it just stops in the middle of the download (files on previous discs would download in a matter of seconds).

I have tried the disc on two separate computers. The first, is a computer that I have never had any problems opening previous discs. The second, is a i7/8GB/1TB speed demon that also could not open the files. Have you done something different with this CD as opposed to previous ones? If not, I will need to have a new CD sent to me.

Best,
David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Toll Free: 1-800-588-4156
Local: (508) 689-4616
Fax: (508) 689-9282
coombs@armycourtmartialdefense.com
www.armycourtmartialdefense.com

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From: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Sent: Tuesday, August 16, 2011 8:17 AM
To: 'coombs@armycourtmartialdefense.com'
Cc: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA; Morrow III, JoDean, CPT USA JFHQ-
NCR/MDW SJA; joshua.tooman@us.army.mil; Matthew kemkes;
paul.r.bouchard@us.army.mil; melissa.s.santiago@us.army.mil;
Cherise.m.purcell@us.army.mil
Subject: RE: [Suspected SPAM] Discovery (UNCLASSIFIED)
Signed By: arthur.ford@Jfhqnrcr.northcom.mil

Classification: UNCLASSIFIED

Caveats: FOUO

Sir,

Thank you very much for letting me know. I will get a new disc in the mail
to you today, and try to figure out why you couldn't open it.

MAJ Kemkes,

Were you able to open your discs?

Thanks.

V/R,

Arthur Ford
WO1, JA
Legal Administrator
Comm: 202-685-1975
BB: 571-289-9690

From: coombs@armycourtmartialdefense.com
Sent: Wednesday, August 17, 2011 12:35 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: Matthew kemkes <matthew.kemkes@us.army.mil>; Paul Bouchard
<bouchardp@yahoo.com>; Joshua Tooman <joshua.tooman@us.army.mil>; Ford,
Arthur D. WO1 USA JFHQ-NCR/MDW SJA <Arthur.Ford@jfhqncr.northcom.mil>;
Margarita.Rodriguez@med.navy.mil
Subject: [Suspected SPAM] RE: Dr. Moulton

Ashden,

The DTS POC for Dr Moulton is Margarita Lopez. She is cc'd on this message.

Best,
David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Toll Free: 1-800-588-4156
Local: (508) 689-4616
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From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Wednesday, August 17, 2011 12:36 PM
To: coombs@armycourtmartialdefense.com
Cc: Matthew kemkes; Paul Bouchard; Joshua Tooman; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; Margarita.Rodriguez@med.navy.mil; Parra, Jairo A. WO1 USA JFHQ-NCR/MDW SJA
Subject: RE: Dr. Moulton

Ms. Rodriguez,

Please send the X-org and other information that we need to add Dr. Moulton onto our LOA to WO1 Parra (CCed). Thank you.

v/r
CPT Fein

From: Kemkes, Matthew J MAJ MIL USA <matthew.kemkes@us.army.mil>
Sent: Wednesday, August 17, 2011 12:37 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Subject: Out of Office AutoReply: Dr. Moulton

Sir/Ma'am,

I am out of the office until 19 August. If you need immediate assistance, please contact CPT Michelle Borgmino or Ms. Lisa Bynoe at (703) 696-6700.

Respectfully,
MAJ Kemkes

From: Paul Bouchard <bouchardp@yahoo.com>
Sent: Wednesday, August 17, 2011 5:27 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqnrc.northcom.mil>
Subject: Request from CPT Bouchard

Ashden:
Give me a call when you get a chance. Just want a sitrep. Issues I want to discuss are safe and secured facility.
Thanks,
Paul

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Wednesday, August 17, 2011 6:36 PM
To: Paul Bouchard
Subject: RE: Request from CPT Bouchard

Paul,
Lets chat tomorrow, unless you need tonight.

Ashden

From: Paul Bouchard <bouchardp@yahoo.com>
Sent: Thursday, August 18, 2011 9:43 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: coombs@armycourtmartialdefense.com
Subject: Request sitrep from CPT Paul Bouchard

Ashden -- just would like to get a situation report as to where we're at.

1. Trent told me he filled out SF86 and eQIP; do let me know any status there.
2. Any issues with our software and hardware requests? Will we get these in time for early September, the target date as to when the Gov't will provide us the classified info?
3. We have a safe at MAJ Kemkes place of work, Fort Myer TDS. Chief Melgar here at Fort Meade informed me she's working to get a safe for my office. Will this second safe just be for the classified docs?
4. Where do you think Eric and Trent will do their computer forensics work, and what are your thoughts about what Eric said regarding the equipment having to run over night?
5. Do you think we're still on track for 1 September with all of the aforementioned?

Any feedback appreciated.

Thanks, Ashden.

Email me or call me anytime.

V/R

Paul

P.S. Still working to get on global e-mail; I'll let you know my new e-mail address once I get it.

From: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Sent: Thursday, August 18, 2011 9:59 AM
To: 'coombs@armycourtmartialdefense.com'
Cc: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA; Waybright, Daniel W. SGT USA JFHQ-NCR/MDW SJA
Subject: Encrypted files (UNCLASSIFIED)
Signed By: arthur.ford@Jfhqnrcr.northcom.mil

Classification: UNCLASSIFIED

Caveats: F000

Mr. Coombs,

In a few moments, you will see an encrypted email from me. It contains a test encrypted document. All the files that you were not able to open were encrypted with your cac certificates. We are trying to figure out why. Could you please advise us if you can open the encrypted pdf file. Again, you will need your cac card to do so. Thank you very much.

V/R,

Arthur Ford

WO1, JA

Legal Administrator

Comm: 202-685-1975

BB: 571-289-9690

From: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Sent: Thursday, August 18, 2011 9:59 AM
To: 'coombs@armycourtmartialdefense.com'
Cc: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA; Waybright, Daniel W. SGT USA JFHQ-NCR/MDW SJA
Subject: This is the file (UNCLASSIFIED)
Attachments: test_file.pdf
Signed By: arthur.ford@Jfhqnrcr.northcom.mil

Classification: UNCLASSIFIED

Caveats: FOUO

V/R,

Arthur Ford

WO1, JA

Legal Administrator

Comm: 202-685-1975

BB: 571-289-9698

From: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Sent: Thursday, August 18, 2011 10:00 AM
To: 'coombs@armycourtmartialdefense.com'
Cc: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Subject: Encrypted file attached (UNCLASSIFIED)
Attachments: test_file.pdf
Signed By: arthur.ford@Jfhqnrc.northcom.mil

Classification: UNCLASSIFIED

Caveats: FOUO

V/R,

Arthur Ford
WO1, JA
Legal Administrator
Comm: 202-685-1975
BB: 571-289-9690

From: coombs@armycourtmartialdefense.com
Sent: Thursday, August 18, 2011 10:02 AM
To: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
<Arthur.Ford@jfhqncr.northcom.mil>
Cc: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>;
Waybright, Daniel W. SGT USA JFHQ-NCR/MDW SJA
<Daniel.Waybright@jfhqncr.northcom.mil>
Subject: [Suspected SPAM] RE: This is the file (UNCLASSIFIED)

Mr. Ford,

I opened the attached PDF document without any issues.

Best,
David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Toll Free: 1-800-588-4156
Local: (508) 689-4616
Fax: (508) 689-9282
coombs@armycourtmartialdefense.com
www.armycourtmartialdefense.com

Confidentiality Notice: This transmission, including attachments, may contain confidential attorney-client information and is intended for the person(s) or company named. If you are not the intended recipient, please notify the sender and delete all copies. Unauthorized disclosure, copying or use of this information may be unlawful and is prohibited.

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Thursday, August 18, 2011 11:49 AM
To: 'paul.r.bouchard@us.army.mil'
Cc: coombs@armycourtmaritaldefense.com; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Subject: RE: Request sitrep from CPT Paul Bouchard

Importance: High

Paul,

Thanks. Sorry I could not call last night. Below are my updates:

1. We should be on track. Did Trent send in his fingerprints and signature card or electronic signature?
2. No issues with the purchasing. Pursuant to the SPCMCA's order dated 10 Aug 11, we are working the purchase request and will have all the material in our office. We will then coordinate through you to get the software to your experts prior to them arriving so they can have their computers ready to go. As a warning, we will likely need them to sign a document that this software is only to be used for the sole purpose of this case and no other purpose based on much of it being from an Army enterprise license.
3. The United States will provide a safe at the Fort Meade TDS office, pursuant to the SPCMCA's directive in his 10 Aug 11 order.
4. Similar to #3, IAW the SPCMCA's 10 Aug 11 order, the forensic work will be conducted at the Fort Meade TDS office. If your experts need to run their computers overnight, then I assume your security experts will let you know that the office/machines must be supervised/monitored the entire time (positive control) because of the classified nature of the information. Please let us know if you need assistance with this given the defense team's security and administrative staff.
5. The goal is still 1 Sep 11; however I owe you, David, and the rest of the team a hard date for planning purposes. In determining this date, we are considering the award of the contract for CyberAgents, final acquisition of all materials needed for the forensic team, and travel planning for the defense for the handover and multi-day explanation. We intend to propose a date NLT Monday COB.

v/r
Ashden

From: Bouchard, Paul R CPT MIL USA OSA <paul.r.bouchard@us.army.mil>
Sent: Thursday, August 18, 2011 1:37 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: coombs@armycourtmartialdefense.com; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA <JoDean.Morrow@jfhqncr.northcom.mil>; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA <Arthur.Ford@jfhqncr.northcom.mil>
Subject: Re: RE: Request sitrep from CPT Paul Bouchard

Thanks, Ashden.

Trent informed me about doing his fingerprints, but I'll confirm this.

V/R

Paul

From: coombs@armycourtmartialdefense.com
Sent: Friday, August 19, 2011 4:00 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqnqr.northcom.mil>
Cc: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
<Arthur.Ford@jfhqnqr.northcom.mil>; paul.r.bouchard@us.army.mil; Matthew kemkes
<matthew.kemkes@us.army.mil>; Joshua Tooman <joshua.tooman@us.army.mil>
Subject: Protective Orders
Attach: Dr. Jehle 2.pdf; Dr. Jehle.pdf; Dr. Grey.pdf; Dr. Moulton.pdf

Ashden,

Please see the attached signed protective orders. These protective orders are for members of the defense team. Although none are defense counsel or an "associate, paralegal, or clerical employee involved in the defense of the accused" each is either detailed to or retained by the defense to assist on this case. It is my understanding, that a separate approval for members of the defense team would not be required. Do you concur with this belief, or does the matter need to be raised with COL Coffman?

Best,
David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Toll Free: 1-800-588-4156
Local: (508) 689-4616
Fax: (508) 689-9282
coombs@armycourtmartialdefense.com
www.armycourtmartialdefense.com

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From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Friday, August 19, 2011 5:28 PM
To: coombs@armycourtmartialdefense.com
Cc: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; paul.r.bouchard@us.army.mil; Matthew kemkes; Joshua Tooman; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA
Subject: RE: Protective Orders

David,

I do not understand what you are asking. Could you please clarify? Thank you.

v/r
Ashden

From: Tooman, Joshua J CPT MIL US USA TRADOC <joshua.tooman@us.army.mil>
Sent: Friday, August 19, 2011 5:28 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Subject: Out of Office AutoReply: Protective Orders

I am currently TDY at Fort Bliss, TX and have limited email access. I will return Monday, 29 August. If you need immediate assistance please call 913-684-1866. Thank you.

From: coombs@armycourtmartialdefense.com
Sent: Friday, August 19, 2011 5:46 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
<Arthur.Ford@jfhqncr.northcom.mil>; paul.r.bouchard@us.army.mil; Matthew kemkes
<matthew.kemkes@us.army.mil>; Joshua Tooman <joshua.tooman@us.army.mil>;
Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA
<Angel.Overgaard@jfhqncr.northcom.mil>; Morrow III, JoDean, CPT USA JFHQ-
NCR/MDW SJA <JoDean.Morrow@jfhqncr.northcom.mil>
Subject: Re: Protective Orders

COL Coffman's order does not seem to include disclosure to defense experts. I am assuming that this is an oversight, and that the defense can share materials with its experts provided the protective orders are signed.

David
Sent from my Verizon Wireless BlackBerry

From: Parra, Jairo A. WO1 USA JFHQ-NCR/MDW SJA
Sent: Friday, August 19, 2011 6:44 PM
To: 'coombs@armycourtmartialdefense.com'; 'Margarita.Rodriguez@med.navy.mil'
Cc: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA; Mathew kemkes; 'Paul Bouchard'; 'Joshua Tooman'; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Subject: RE: Dr. Moulton (UNCLASSIFIED)
Signed By: PARRA.JAIRO.ALBERTO.1263937372

Classification: UNCLASSIFIED

Caveats: FOUO

Ms. Rodriguez,

I received an e-mail (please read below) that identifies you as the POC for Dr. Moulton travel arrangements. For your SA, I have not received, as of today, any information that allows me to create across-org on DTS for Dr. Moulton. It is of the outmost urgency that you contact me at your earliest convenience to arrange travel arrangements and payment option for Dr. Moulton. I sincerely appreciate you prompt response and assistance in this matter. Thank you

v/r,

JP

Jairo A. Parra
WO1, JA
Legal Administrator
JFHQ-NCR, MDW
jairo.parra@fhqnncr.northcom.mil
jairo.parra@us.army.mil
jairo.parra@fhqnncr.northcom.smil.mil
(202) 685-1975 - Direct
(571) 249-9697 - Blackberry
(931) 572-7632 - Cell

CAUTION: The information contained in this email and any accompanying attachments may contain Freedom of Information Act protected information, including attorney-client or attorney work product privileged information. This information may not be released outside of the Department of Defense without prior authorization from the Office of The Judge Advocate General, Department of the Army. If you are not the intended recipient of this information, any disclosure, copying, distribution, or the taking of any action in reliance on this information is prohibited. If you received this email in error, please notify this office immediately by return email (see 5 U.S.C. § 552 and Army Regulations 25-55 and 27-2).

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Friday, August 19, 2011 6:52 PM
To: coombs@armycourtmartialdefense.com
Cc: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; paul.r.bouchard@us.army.mil; Matthew kemkes; Joshua Tooman; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA
Subject: RE: Protective Orders

David,

All those on the defense team, including expert consultants and witnesses are included under COL Coffman's order. It was intended and briefed to the COL Coffman that paragraph 2 sub (f), includes "technical or expert services or testimony" for the defense. We do understand the remainder of the sentence states "in the prosecution of the accused" but we considered that statement more broadly to include the prosecution and defense, since the "prosecution of the accused" cannot occur without the defense having access to the information.

v/r
Ashden

From: PSIP Center of Excellence <psip@conus.army.mil>
Sent: Sunday, August 21, 2011 6:14 AM
To: trent.struttmann@gmail.com; ts@cyberagentsinc.com
Cc: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>; larry.rains@us.army.mil; charles.r.jordan@us.army.mil
Subject: Investigation Status Update - Processing, Ticket No. CLR00000157377

Mr. TRENT GREGORY STRUTTMANN:

The below information is required to continue processing your background investigation. You were notified via email of the requirement to complete the online electronic form for this investigation. As a reminder, the link to the form is: <http://www.opm.gov/e-qip/>.

In order to continue processing your background investigation, please submit the following information to the PSI-CoE.

Required Documentation:

FINGERPRINTS REQUIRED:

Fingerprint cards- Contact your local security office or hiring official to facilitate

AR 380-67 states that "failure to respond within the time limit prescribed by the requesting organization with the required security forms or refusal to provide or permit access to the relevant information required by this regulation shall result in termination of the individual's security investigation or assignment to sensitive duties utilizing the procedures of paragraph 8-201 or further administrative processing of investigative requirement."

If you no longer require a DoD background investigation or you cannot comply with these instructions, please have your security manager contact the PSI CoE.

If you have any questions, please call 410-278-4194 or DSN 298-4194 or email us at imneapgesi5@conus.army.mil.

The PSI-CoE call center is open between the hours of 0600 and 2400 Monday through Friday. All times are EST.

Documentation required for this investigation request may be faxed to 410-306-3858 or DSN 458-3858 or scanned and e-mailed to imneapgesi@conus.army.mil.

Your prompt attention to this matter will be greatly appreciated.

Please do not respond to this email, as responses are not monitored.

PSIP Record Number: CLR00000157377
Email Code: PSIP-0003

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Sunday, August 21, 2011 8:54 AM
To: 'paul.r.bouchard@us.army.mil'; 'coombs@armycourtmartialdefense.com'
Cc: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; Morrow III, JoDean, CPT USA JFHQ-
NCR/MDW SJA
Subject: Fw: Investigation Status Update - Processing, Ticket No. CLR000000157377

Paul. Please see below. Trent needs to send in his fingerprint card or he will not be granted a clearance. Please let me know when this occurs so we can continue moving on this issue. Thanks.

Vr ashden

From: Bouchard, Paul R CPT MIL USA OSA <paul.r.bouchard@us.army.mil>
Sent: Sunday, August 21, 2011 11:04 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: coombs@armycourtmartialdefense.com; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW
SJA <Arthur.Ford@jfhqncr.northcom.mil>; Morrow III, JoDean, CPT USA JFHQ-
NCR/MDW SJA <JoDean.Morrow@jfhqncr.northcom.mil>
Subject: Re: Fw: Investigation Status Update - Processing, Ticket No. CLR000000157377

Trent:
Please read below and comply -- we need this to happen asap for your security clearance.
Thanks.
Paul

From: PSIP Center of Excellence <psip@conus.army.mil>
Sent: Monday, August 22, 2011 10:33 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <ashden.fein@jfhqncr.northcom.mil>; larry.rains@us.army.mil; charles.r.jordan@us.army.mil
Cc: trent.struttmann@gmail.com; ts@cyberagentsinc.com
Subject: Informational, Security Clearance Processing, Ticket No. CLR000000157377

The Army Investigative Enterprise System (AIES) PSI Center of Excellence (PSI CoE) has received all of the required documentation from TRENT GREGORY STRUTTMANN. At this time, no further action is required. The investigative packet has been submitted to OPM for scheduling.

If you have any questions, please contact the PSI CoE.

If you have any questions, please call 410-278-4194 or DSN 298-4194 or email us at imneapgesi5@conus.army.mil.

The PSI-CoE call center is open between the hours of 0600 and 2400 Monday through Friday. All times are EST.

Documentation required for this investigation request may be faxed to 410-306-3858 or DSN 458-3858 or scanned and e-mailed to imneapgesi@conus.army.mil.

Please do not respond to this email, as responses are not monitored.

PSIP Record Number: CLR000000157377
Email Code: PSIP-0006

From: Bouchard, Paul R CPT MIL USA OSA <paul.r.bouchard@us.army.mil>
Sent: Monday, August 22, 2011 10:34 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>;
coombs@armycourtmartialdefense.com
Cc: ts@cyberagentsinc.com
Subject: Trent's fingerprints (UNCLASSIFIED)

Classification: UNCLASSIFIED

Ashden:

Please read below. I received this e-mail from Trent this morning.

Let me know if you have any questions.

Thanks.

Paul

Cell: 915-603-7651

Paul,

I contacted the person who took my prints and she said everything went though just fine. She said that the e-mail we received was a standard e-mail sent to all applicants and that we should ignore that because the prints have been submitted. Her name is Nicki Clarke and she can be reached at 1-502 624 1655 if you need to ask her anything.

Respectfully,

Trent

Cyber Agents, Inc.
616 Pasadena Dr
Lexington, KY
Office: +1 859 523 9081
Mobile: +1 859 368 2040
On 08/21/11, "Fein, Ashden CPT USA JFHQ-NCR/MDW SJA" <Ashden.Fein@jfhqncr.northcom.mil> wrote:

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Monday, August 22, 2011 7:07 PM
To: coombs@armycourtmaritaldefense.com
Cc: Matthew kemkes; paul.r.bouchard@us.army.mil; Joshua Tooman; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA
Subject: US v. PFC BM Discovery, etc.

David,

Good evening. Below is an update on discovery and other issues:

1. A CD containing the Clausen files (036804-042806) was sent to you (7010-1060-0001-1272-6282) and MAJ Kemkes should have received his copy today or will tomorrow.
2. Last week, I emailed Paul that we should have an answer by COB today on when we expect to have the classified forensic evidence ready for you and your team. For multiple reasons, we will not be able to provide an answer today. I hope to be able to provide an answer by the end of this week to allow you and your experts adequate time to plan for travel.
3. Trent Struttmann's clearance is being expeditiously processed. All of his information appears to be received.
4. Contracting has received the CyberAgents contract and is working to award the sole-source contract so we can ensure their payments are preapproved prior to their arrival.
5. We are working on finalizing the acquisition of the defense forensic computer equipment and software. Our intent is to acquire all the material and then send it to your experts (once officially retained by Contracting) so they can preload the software and be ready to go.
6. We are working on finalizing Dr. Moulton's travel arrangements (DTS) so he can freely travel to LVN-CAC.

v/r
Ashden

From: Bouchard, Paul R CPT MIL USA OSA <paul.r.bouchard@us.army.mil>
Sent: Tuesday, August 23, 2011 8:05 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: coombs@armycourtmaritaldefense.com; Matthew kemkes
<matthew.kemkes@us.army.mil>; Joshua Tooman <joshua.tooman@us.army.mil>;
Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
<Arthur.Ford@jfhqncr.northcom.mil>; Overgaard, Angel M. CPT USA JFHQ-
NCR/MDW SJA <Angel.Overgaard@jfhqncr.northcom.mil>; Morrow III, JoDean, CPT
USA JFHQ-NCR/MDW SJA <JoDean.Morrow@jfhqncr.northcom.mil>
Subject: Re: US v. PFC BM Discovery, etc.

Thanks, Ashden.
FYI -- I have to teach a class at Camp LeJeune, NC on Thursday. I will have e-mail capabilities and cell phone.
V/R
Paul

From: Rains, Larry E Mr CIV USA DCS G-2 [larry.rains@us.army.mil]
Sent: Tuesday, August 23, 2011 4:39 PM
To: ts@cyberagentsinc.com
Cc: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Subject: (U) Non-Disclosure Agreement
Attachments: SF 312 - STRUTTMAN.pdf
Signed By: larry.rains@us.army.mil

Classification: UNCLASSIFIED//FOR OFFICIAL USE ONLY

Trent,

Please print, read, and sign in front of a witness. Have witness complete "Witness" block. Then please scan and send back to me.

After I receive the SF-312, I will grant you an interim Secret clearance and post the information in JPAS. Thanks.

Best regards,
Larry

Larry Rains
Security Manager/SSR
HQDA, ODCS, G-2
1000 Army Pentagon
Washington DC 20310-1000
Comm: 703-695-1125
Fax: 703-695-2648

Classification: UNCLASSIFIED//FOR OFFICIAL USE ONLY

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Tuesday, August 23, 2011 5:17 PM
To: paul.r.bouchard@us.army.mil
Cc: coombs@armycourtmartialdefense.com; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Subject: FW: (U) Non-Disclosure Agreement
Attachments: SF 312 - STRUTTMAN.pdf

Paul- FYSA.

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Tuesday, August 23, 2011 5:17 PM
To: paul.r.bouchard@us.army.mil
Cc: coombs@armycourtmarialdefense.com; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Subject: FW: (U) Non-Disclosure Agreement
Attachments: SF 312 - STRUTTMAN.pdf

Paul- FYSA.

From: Bouchard, Paul R CPT MIL USA OSA <paul.r.bouchard@us.army.mil>
Sent: Wednesday, August 24, 2011 8:48 AM
To: ts@cyberagentsinc.com; edl@cyberagents.com; Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <ashden.fein@jfhqncr.northcom.mil>
Cc: coombs@armycourtmartialdefense.com; larry.rains@us.army.mil
Subject: Fwd: FW: (U) Non-Disclosure Agreement
Attach: FW_(U) Non-Disclosure Agreement.msg

Trent,

Please read the following e-mail from Mr. Rains and comply. Do cc me as well.

V/R

Paul

Trent, from Mr. Larry Rains:

Please print, read, and sign in front of a witness. Have witness complete "Witness" block. Then please scan and send back to me.

After I receive the SF-312, I will grant you an interim Secret clearance and post the information in JPAS. Thanks.

Best regards,
Larry

Larry Rains
Security Manager/SSR
HQDA, ODCS, G-2
1000 Army Pentagon
Washington DC 20310-1000
Comm: 703-695-1125
Fax: 703-695-2648

From: Rains, Larry E Mr CIV USA DCS G-2 [larry.rains@us.army.mil]
Sent: Wednesday, August 24, 2011 9:02 AM
To: Bouchard, Paul R CPT MIL USA OSA
Cc: coombs@armycourtmartialdefense.com; ts@cyberagentsinc.com; edl@cyberagents.com; Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Subject: RE: FW: (U) Non-Disclosure Agreement
Signed By: larry.rains@us.army.mil

Classification: UNCLASSIFIED//FOR OFFICIAL USE ONLY

I received the SF-312 from Trent this morning. He has been granted an Interim Secret clearance.

Best regards,
Larry

From: Bouchard, Paul R CPT MIL USA OSA <paul.r.bouchard@us.army.mil>
Sent: Wednesday, August 24, 2011 11:54 AM
To: Rains, Larry E Mr CIV USA DCS G-2 <larry.rains@us.army.mil>
Cc: coombs@armycourtmartialdefense.com; ts@cyberagentsinc.com; edl@cyberagents.com; Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <ashden.fein@jfhqncr.northcom.mil>
Subject: RE: FW: (U) Non-Disclosure Agreement (UNCLASSIFIED)

Classification: UNCLASSIFIED

Thank you, sir.

Respectfully,

CPT Paul Bouchard

Defense Counsel

Fort Meade, Maryland

Office: 301-677-9231

On 08/24/11, "Rains, Larry E Mr CIV USA DCS G-2" <larry.rains@us.army.mil> wrote:

> Classification: UNCLASSIFIED//FOR OFFICIAL USE ONLY

>
> I received the SF-312 from Trent this morning. He has been granted an
> Interim Secret clearance.
>
> Best regards,
> Larry
>
>
> -----Original Message-----
> From: Bouchard, Paul R CPT MIL USA OSA [mailto:paul.r.bouchard@us.army.mil] (javascript:main.compose())
> Sent: Wednesday, August 24, 2011 8:48 AM
> To: ts@cyberagentsinc.com; edl@cyberagents.com;
> ashden.fein@jfhqncr.northcom.mil
> Cc: coombs@armycourtmartialdefense.com; Rains, Larry E Mr CIV USA DCS G-2
> Subject: Fwd: FW: (U) Non-Disclosure Agreement
>
> Trent,
>
> Please read the following e-mail from Mr. Rains and comply. Do cc me as
> well.
> V/R
> Paul
>
> Trent, from Mr. Larry Rains:
>
> Please print, read, and sign in front of a witness. Have witness complete
> "Witness" block. Then please scan and send back to me.
>
> After I receive the SF-312, I will grant you an interim Secret clearance and
> post the information in JPAS. Thanks.
>
> Best regards,
> Larry
>
> Larry Rains
> Security Manager/SSR
> HQDA, ODCS, G-2
> 1000 Army Pentagon
> Washington DC 20310-1000
> Comm: 703-695-1125
> Fax: 703-695-2648
>
>
> Classification: UNCLASSIFIED//FOR OFFICIAL USE ONLY
Classification: UNCLASSIFIED

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Wednesday, August 24, 2011 12:51 PM
To: Matthew kemkes
Cc: coombs@armycourtmartialdefense.com; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Boston, Louis J. MAJ USA JFHQ-NCR/MDW SJA; Chandler, Rodrick D. CW4 USA JFHQ-NCR/MDW SJA
Subject: Classified Computers

MAJ Kemkes,

We are still working on getting three computers to be used by the defense to view, store, and handle classified information, above the resourcing requirements for the forensic computer expert consultants. As you know, there are special rules for the defense handling and using classified information, and the prosecution team is best suited to ensure all rules are followed and to ensure you have equal access to evidence. Therefore, the main office kicked this resourcing issue over to the prosecution team and we are directly working the issue to ensure that you have adequate systems in place to use the classified information you are provided in discovery.

We will have final resolution on which computers will be signed over to the defense prior to the disclosure of any classified information and with adequate time to prepare your offices to receive the equipment and subsequent information.

If you have any questions about this support, please let me know.

Thank you.

v/r
Ashden

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Thursday, August 25, 2011 9:54 PM
To: Coffman, Carl R COL MIL USA
Cc: Matthew kemkes; coombs@armycourtmartialdefense.com; Tooman, Joshua J CPT MIL US USA TRADOC; paul.r.bouchard@us.army.mil; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Subject: US v. PFC BM (Art 32 Delay Request)
Attachments: 11-Aug-25-Government Request to Delay Article 32 (ManningB).pdf
Importance: High

Sir,

The United States requests an additional delay of the Article 32. Please see the attached request.

v/r
CPT Fein

From: Paul Bouchard <bouchardp@yahoo.com>
Sent: Friday, August 26, 2011 11:23 AM
To: coombs@armycourtmartialdefense.com; Matthew kemkes
<matthew.kemkes@us.army.mil>; edl@cyberagentsinc.com; ts@cyberagentsinc.com
Cc: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>;
paul.r.bouchard.mil@mail.mil
Subject: New e-mail address for CPT Paul Bouchard

All:

My Outlook Email is now up and running. That e-mail address is paul.r.bouchard@mil@mail.mil. You can still send me stuff on my AKO and Yahoo e-mail addresses.

V/R

CPT Paul Bouchard

From: carl.coffman@us.army.mil
Sent: Saturday, August 27, 2011 6:31 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: Matthew kemkes <matthew.kemkes@us.army.mil>;
coombs@armycourtmaritaldefense.com; Tooman, Joshua J CPT MIL US USA
TRADOC <joshua.tooman@us.army.mil>; paul.r.bouchard@us.army.mil; Morrow III,
JoDean, CPT USA JFHQ-NCR/MDW SJA <JoDean.Morrow@jfhqncr.northcom.mil>;
Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA
<Angel.Overgaard@jfhqncr.northcom.mil>; Ford, Arthur D. WO1 USA JFHQ-
NCR/MDW SJA <Arthur.Ford@jfhqncr.northcom.mil>
Subject: Re: US v. PFC BM (Art 32 Delay Request)

Mr. Coombs.
Do you have any issues or additions?
COL Coffman
Sent via BlackBerry by AT&T

From: coombs@armycourtmartialdefense.com
Sent: Saturday, August 27, 2011 7:51 PM
To: carl.coffman@us.army.mil
Cc: Matthew kemkes <matthew.kemkes@us.army.mil>; Tooman,Joshua J CPT MIL US USA TRADOC <joshua.tooman@us.army.mil>; paul.r.bouchard@us.army.mil; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA <JoDean.Morrow@jfhqncr.northcom.mil>; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA <Angel.Overgaard@jfhqncr.northcom.mil>; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA <Arthur.Ford@jfhqncr.northcom.mil>; Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Subject: [Suspected SPAM] RE: US v. PFC BM (Art 32 Delay Request)

Sir,

The Defense maintains its previous position that any additional delay should not be excluded under R.C.M. 707(c). Instead, the requested delay should be credited to the Government for speedy trial purposes under Article 10 of the Uniform Code of Military Justice.

V/R
David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Toll Free: 1-800-588-4156
Local: (508) 689-4616
Fax: (508) 689-9282
coombs@armycourtmartialdefense.com
www.armycourtmartialdefense.com

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From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Monday, August 29, 2011 7:27 AM
To: coombs@armycourtmartialdefense.com
Cc: Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA
Subject: RE: [Suspected SPAM] RE: US v. PFC BM (Art 32 Delay Request)

David,

Are you available to have a phone meeting this week? I would like to give you an update and answer any questions you might have.

Thanks.

v/r
Ashden

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Monday, August 29, 2011 9:14 AM
To: paul.r.bouchard.mil@mail.mil
Cc: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA
Subject: Charge Sheets
Attachments: 10-Jul-05-Original Charge Sheet DISMISSED REDACTED (ManningB).pdf; 11-Mar-01-Additional Charge Sheet REDACTED (ManningB).pdf; 11-Mar-08 Additional Charges Transmittal REDACTED (ManningB).pdf

Paul,

Attached is the original charge sheet (dimissed), the additional charge sheet which is now the charge sheet, and the transmittal.

v/r
Ashden

From: coombs@armycourtmartialdefense.com
Sent: Monday, August 29, 2011 9:19 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA
<JoDean.Morrow@jfhqncr.northcom.mil>
Subject: RE: [Suspected SPAM] RE: US v. PFC BM (Art 32 Delay Request)

Ashden,

How does tomorrow afternoon work for you? I am available anytime after 1300.

Best,
David

David E. Coombs, Esq.
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From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Monday, August 29, 2011 9:20 AM
To: 'paul.r.bouchard.mil@mail.mil'
Cc: Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Subject: Charge Sheets
Attachments: 10-Jul-05-Original Charge Sheet DISMISSED REDACTED (ManningB).pdf; 11-Mar-01-Additional Charge Sheet REDACTED (ManningB).pdf; 11-Mar-08 Additional Charges Transmittal REDACTED (ManningB).pdf

Paul,

Attached is the original charge sheet (dimissed), the additional charge sheet which is now the charge sheet, and the transmittal.

v/r
Ashden

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Monday, August 29, 2011 9:20 AM
To: coombs@armycourtmartialdefense.com
Cc: Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA
Subject: RE: [Suspected SPAM] RE: US v. PFC BM (Art 32 Delay Request)

David,

Thank you. How is 1700?

v/r
Ashden

From: coombs@armycourtmartialdefense.com
Sent: Monday, August 29, 2011 9:23 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqnrc.northcom.mil>
Cc: Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA
<JoDean.Morrow@jfhqnrc.northcom.mil>
Subject: RE: [Suspected SPAM] RE: US v. PFC BM (Art 32 Delay Request)

Ashden,

1700 works for me.

Best,
David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Toll Free: 1-800-588-4156
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From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Monday, August 29, 2011 9:24 AM
To: Paul Bouchard; coombs@armycourtmartialdefense.com; Matthew kernkes; edl@cyberagentsinc.com; ts@cyberagentsinc.com
Cc: paul.r.bouchard.mil@mail.mil
Subject: RE: New e-mail address for CPT Paul Bouchard

Paul - this email address does not work, nor does the
paul.r.bouchard.mil@mail.mil.

From: Paul Bouchard <bouchardp@yahoo.com>
Sent: Monday, August 29, 2011 9:32 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqnqr.northcom.mil>
Subject: Re: New e-mail address for CPT Paul Bouchard

Ashden:
That's my new e-mail (paul.r.bouchard.mil@mail.mil) but I guess there's some connectivity issue.
Can you send me the updated charge sheet at paul.r.bouchard@us.army.mil.
V/R
Paul

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Monday, August 29, 2011 9:37 AM
To: paul.r.bouchard@us.army.mil
Cc: Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Subject: FW: Charge Sheets
Attachments: 10-Jul-05-Original Charge Sheet DISMISSED REDACTED (ManningB).pdf; 11-Mar-01-Additional Charge Sheet REDACTED (ManningB).pdf; 11-Mar-08 Additional Charges Transmittal REDACTED (ManningB).pdf

From: coombs@armycourtmartialdefense.com
Sent: Monday, August 29, 2011 2:45 PM
To: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
<Arthur.Ford@jfhqncr.northcom.mil>; Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
<Ashden.Fein@jfhqncr.northcom.mil>
Cc: Matthew kemkes <matthew.kemkes@us.army.mil>; paul.r.bouchard.mil@mail.mil; Joshua Tooman <joshua.tooman@us.army.mil>
Subject: CD

Mr. Ford,

My office has received the unclassified discovery disc 036804-042806. I was able to download and open the contents of the disc.

Best,
David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Toll Free: 1-800-588-4156
Local: (508) 689-4616
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From: coombs@armycourtmartialdefense.com
Sent: Monday, August 29, 2011 3:01 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Subject: RE: [Suspected SPAM] RE: US v. PFC BM (Art 32 Delay Request)

Ashden,

I need to reschedule our call. I just received news that a close family member passed away unexpectedly. I am leaving tomorrow to participate in the funeral arrangements. I do not anticipate returning to the office this week. If there is something important for us to discuss, I can make time to talk to you tonight. Otherwise, lets talk sometime early next week.

David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Toll Free: 1-800-588-4156
Local: (508) 689-4616
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From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Monday, August 29, 2011 3:02 PM
To: coombs@armycourtmartialdefense.com
Subject: RE: [Suspected SPAM] RE: US v. PFC BM (Art 32 Delay Request)

David,

I am sorry to hear. I wanted to give you an update, but nothing is that pressing. Lets talk next week. I hope to have a proposed set of days for us to get together and handover the classified information.

v/r
Ashden

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Monday, August 29, 2011 3:18 PM
To: coombs@armycourtmartialdefense.com
Cc: Matthew kemkes; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Subject: one note

David,

One thing I was planning on doing during our phone call tomorrow was to give you a heads up, that your client has been on formal attachment orders to MDW, and now we plan on having him PCSed to the MDW in the next two weeks. His physical location will not change, but his personnel actions will move to the MDW.

Thanks.

v/r
Ashden

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Monday, August 29, 2011 3:39 PM
To: coombs@armycourtmartialdefense.com; Matthew kemkes; Tooman, Joshua J CPT MIL US USA TRADOC; paul.r.bouchard@us.army.mil
Cc: Parra, Jairo A. WO1 USA JFHQ-NCR/MDW SJA; Chandler, Rodrick D. CW4 USA JFHQ-NCR/MDW SJA
Subject: Dr. Moulton Travel/LOA
Importance: High

Defense-

Please read below and let all your experts and others know for future travel. Thank you.

v/r
CPT Fein

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Monday, August 29, 2011 7:29 PM
To: 'Almanza, Paul'
Cc: 'coombs@armycourtmartialdefense.com'; Matthew kemkes; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; 'paul.bouchard@us.army.mil'; 'Haberland, John CPT MIL USA'; Overgaard, Angel M, CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; 'Joshua Tooman'
Subject: US v. PFC BM Article 32 Delay
Attachments: 11-Aug-29-SPCMCA Delay of Article 32 Investigation (ManningB).pdf
Importance: High

LTC Almanza,

Good evening. Please find attached an Article 32 delay approval signed by the SPCMCA.

Thank you.

v/r
CPT Fein

Ashden Fein
CPT, JA

From: Almanza, Paul <Paul.Almanza@usdoj.gov>
Sent: Tuesday, August 30, 2011 12:59 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqnqr.northcom.mil>
Cc: coombs@armycourtmartialdefense.com; Matthew kemkes
<matthew.kemkes@us.army.mil>; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW
SJA <JoDean.Morrow@jfhqnqr.northcom.mil>; paul.bouchard@us.army.mil;
Haberland,John CPT MIL USA <john.haberland@us.army.mil>; Overgaard, Angel M.
CPT USA JFHQ-NCR/MDW SJA <Angel.Overgaard@jfhqnqr.northcom.mil>; Ford,
Arthur D. WO1 USA JFHQ-NCR/MDW SJA <Arthur.Ford@jfhqnqr.northcom.mil>;
Joshua Tooman <joshua.tooman@us.army.mil>
Subject: RE: US v. PFC BM Article 32 Delay

Thank you, CPT Fein.

LTC Almanza

From: Paul Bouchard <bouchardp@yahoo.com>
Sent: Wednesday, August 31, 2011 9:17 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: coombs@armycourtmartialdefense.com; edl@cyberagentsinc.com;
ts@cyberagentsinc.com
Subject: Message from CPT Paul Bouchard

Ashden -- FYI:

Eric and Trent have informed me that September 10-20 would work well for them to do the computer forensics. (They have a case at Fort Bragg slated to end around Sept. 8; they could then drive up here and do the computer forensics for US v. Manning). Do you think this can work?
We do have the Safe for classified data next to my office. When do you think you'll provide us with the classified data and our software and hardware requests? Also, where (what facility) will they do the actual computer forensics work?

Thanks,

Paul

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Wednesday, August 31, 2011 9:21 AM
To: Paul Bouchard
Cc: coombs@armycourtmaritaldefense.com; edi@cyberagentsinc.com; ts@cyberagentsinc.com; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; Morrow III, JoDean, CPT USA JFHQ- NCR/MDW SJA
Subject: RE: Message from CPT Paul Bouchard

Paul,

Thank you. That will not likely work for three reasons:

1. We are still working on receiving the final approvals from CIDC on the release of their reports. We had to first get the underlying approvals for all the substance evidence and now they are working on the final part.
2. Army contracting is still working on awarding CyberAgents the contract for expert services. That might not be completed by that point.
3. The equipment we ordered is on its way and should be here by the middle of next week. Once we receive it and the contract for CyberAgents is awarded, we will ship it out to CyberAgents for them to get their computers ready for work. We plan on offering this to minimize any delay once they arrive in the area.

As of today, I estimate the last week of September as being the time for us to have all the authorities to turn over the classified evidence to the defense. I do not recommend making non-refundable plans for the last week, but that is our target. I will have better clarity by the middle of next week.

v/r
Ashden

From: Paul Bouchard <bouchardp@yahoo.com>
Sent: Wednesday, August 31, 2011 9:49 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: coombs@armycourtmartialdefense.com; edl@cyberagentsinc.com;
ts@cyberagentsinc.com; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
<Arthur.Ford@jfhqncr.northcom.mil>; Morrow III, JoDean, CPT USA JFHQ-
NCR/MDW SJA <JoDean.Morrow@jfhqncr.northcom.mil>
Subject: Re: Message from CPT Paul Bouchard

Thanks, Ashden.

V/R

Paul

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Wednesday, August 31, 2011 3:00 PM
To: Matthew kemkes
Subject: tomorrow

Sir- will you be around your office at 1200 tomorrow?

From: Kemkes, Matthew J MAJ MIL USA [matthew.kemkes@us.army.mil]
Sent: Thursday, September 01, 2011 9:02 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Subject: RE: tomorrow (UNCLASSIFIED)
Signed By: matthew.kemkes@us.army.mil

Classification: UNCLASSIFIED

Caveats: FOUO

I can be here if you need me to be. What's up?

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Thursday, September 01, 2011 9:44 AM
To: Kemkes, Matthew J MAJ MIL USA
Subject: RE: tomorrow (UNCLASSIFIED)

I thought we would have classified information to turn-over and I was going to bring the CD and the computer. But it won't happen today. Likely very early next week- not forensic info but docs from an organization.

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Thursday, September 01, 2011 11:13 AM
To: coombs@armycourtmartialdefense.com
Cc: Kemkes, Matthew J MAJ MIL USA; paul.r.bouchard@us.army.mil; 'Joshua Tooman'; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Subject: US v. PFC BM (Discovery Update)

David,

We placed a DVD in the mail today containing unclassified discovery (BATES: 042807-044864). This DVD includes multiple pretrial confinement documents from the confinement facilities. A copy is being delivered to MAJ Kemkes today.

v/r
Ashden

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Thursday, September 01, 2011 11:13 AM
To: 'coombs@armycourtmartialdefense.com'
Cc: Matthew kemkes; 'paul.r.bouchard@us.army.mil'; 'Joshua Tooman'; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Subject: US v. PFC BM (Discovery Update)

David,

We placed a DVD in the mail today containing unclassified discovery (BATES: 042807-044864). This DVD includes multiple pretrial confinement documents from the confinement facilities. A copy is being delivered to MAJ Kemkes today.

v/r
Ashden

From: Tooman, Joshua J CPT MIL US USA TRADOC <joshua.tooman@us.army.mil>
Sent: Wednesday, September 7, 2011 8:22 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqnrc.northcom.mil>
Subject: Out of Office AutoReply: Email Outage

I am currently out of the office. I will return Friday, 9 September. If you need immediate assistance please call 913-684-1866. Thank you.

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Thursday, September 08, 2011 11:38 AM
To: Matthew kemkes; coombs@armycourtmartialdefense.com
CC: Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Boston, Louis J. MAJ USA JFHQ-NCR/MDW SJA; Chandler, Rodrick D. CW4 USA JFHQ-NCR/MDW SJA
Subject: FW: Classified Computers

Importance: High

Dave and MAJ Kemkes,

In addition to the administrative and logistical support the OSJA is providing for all matters unclassified, the prosecution (on behalf of the convening authority) is working to provide the defense team three laptops that will be ready to start processing classified information (please refer to the below email, dated 24 Aug 11).

If you need additional classified information systems or other logistical support for classified information for your case, please provide a written request to the convening authority with justification, so that we can process the request and determine if there are additional assets available and what approvals we must obtain.

Please stress to your entire team that all information and any information system associated with classified information must go through a formal request process and not the normal acquisition processes. The prosecution is ready to assist, once the request is made.

Thank you.

v/r
Ashden

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Tuesday, September 13, 2011 12:48 PM
To: paul.r.bouchard@us.army.mil
Cc: coombs@armycourtmartialdefense.com; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Subject: Defense Expert Contract

Paul,

Could you please confirm whether CyberAgents received the contract and is ready to start providing direct services?

Thank you.

v/r
Ashden

From: Bouchard, Paul R CPT MIL USA OSA <paul.r.bouchard@us.army.mil>
Sent: Tuesday, September 13, 2011 12:59 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: edl@cyberagentsinc.com; ts@cyberagentsinc.com
Subject: Re: Defense Expert Contract (UNCLASSIFIED)

Classification: UNCLASSIFIED

Eric/Trent:

Please respond to CPT Fein's inquiry. It is my understanding that you received the contract and that you are ready to do the work.
Respectfully,
CPT Bouchard

From: Eric Lakes <edl@cyberagentsinc.com>
Sent: Tuesday, September 13, 2011 1:05 PM
To: Bouchard, Paul R CPT MIL USA OSA <paul.r.bouchard@us.army.mil>; Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: edl@cyberagentsinc.com; ts@cyberagentsinc.com
Subject: Re: Defense Expert Contract (UNCLASSIFIED)

They sent me the contract to sign off on a couple of weeks ago

Eric Lakes
Digital Forensic Examiner
Certified Computer Examiner (CCE)
Certified Homeland Security - III
MCSE, MCP+I, MCP, Network Plus, A+
Cyber Agents, Inc.
<http://www.cyberagentsinc.com>
616 Pasadena Drive
Lexington, KY 40503
cell - 859.983.6655
land line - 859.523.9081 or 9082

From: Bouchard, Paul R CPT MIL USA OSA <paul.r.bouchard@us.army.mil>
Sent: Tuesday, September 13, 2011 2:53 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: coombs@armycourtmartialdefense.com; edl@cyberagentsinc.com
Subject: Re: Defense Expert Contract, US v. Manning

Ashden:

E-mailed and just got off the phone with Eric Lakes. Yes, CyberAgents did receive the contract. Eric filled it out and sent it back to a Ms. Sherry Carter who I believe is out of Fort Myer. Eric and Trent are ready to do the work.

NOTE: Eric has trials from October 11-29 and another one on Nov. 13. He told me the last week of September and 1st week of October would work.

Also, I recommend we have another teleconference with Eric to ensure all is good to go before he and Trent travel here, i.e. what facility will the work be done at, is all the hardware and software we the Defense requested in order, etc.

V/R
Paul

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Thursday, September 15, 2011 8:58 PM
To: coombs@armycourtmarialdefense.com
Cc: Matthew kemkes; Tooman,Joshua J CPT MIL US USA TRADOC; paul.r.bouchard@us.army.mil; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Subject: US v. PFC BM (Excludable Delay and Document Issue)
Attachments: 11-Sep-15-Excludable Delay Memorandum (ManningB).pdf
Importance: High

David and the Defense Team,

Attached is an accounting of the excludable delay.

-Break-

We have recently learned the page marked BATES 24459 should have been marked classified by the original source, and we produced this page on an unclassified disk on 25 July 2011. Please take the following remedial steps to remove the document from your computer:

1. Destroy the unclassified disk containing the file "Unclassified Discovery Manning (24363-24862).pdf".
2. Permanently destroy or delete any paper or digital copy of the document, or any digital file containing the contents of BATES 24459.
3. Notify Mr. Ford when you have completed 1 & 2.

We will immediately re-produce the documents in their entirety on a new disc so that you may maintain them on your unclassified systems, with a redacted version of the classified document. We will also produce in classified discovery, an original copy of the document.

Please let me know if you have any questions. Thank you.

v/r
Ashden

From: Kemkes, Matthew J MAJ MIL USA <matthew.kemkes@us.army.mil>
Sent: Thursday, September 15, 2011 8:59 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Subject: Out of Office AutoReply: US v. PFC BM (Excludable Delay and Document Issue)

Sir/Ma'am,

I am out of the office until 19 September. If you need immediate assistance, please contact CPT Michelle Borgnino or Ms. Lisa Bynoe at (703) 696-6700.

Respectfully,
MAJ Kemkes

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Thursday, September 15, 2011 9:02 PM
To: coombs@armycourtmartialdefense.com
Cc: Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA
Subject: chat

David,

I hope all is well. Are you available tomorrow or early next week to chat?
Thanks.

Ashden

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Thursday, September 15, 2011 9:02 PM
To: coombs@armycourtmartialdefense.com
Cc: Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA
Subject: chat

David,

I hope all is well. Are you available tomorrow or early next week to chat?
Thanks.

Ashden

From: coombs@armycourtmartialdefense.com
Sent: Thursday, September 15, 2011 10:53 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: Matthew kemkes <matthew.kemkes@us.army.mil>; Tooman, Joshua J CPT MIL US USA TRADOC <joshua.tooman@us.army.mil>; paul.r.bouchard@us.army.mil; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA <JoDean.Morrow@jfhqncr.northcom.mil>; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA <Angel.Overgaard@jfhqncr.northcom.mil>; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA <Arthur.Ford@jfhqncr.northcom.mil>
Subject: [Suspected SPAM] RE: US v. PFC BM (Excludable Delay and Document Issue)

Ashden,

Are you sure that you mean 24459? This document, 24459, is a CCIU chain of custody document concerning a Quantico taped conversation.

Best,
David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Toll Free: 1-800-588-4156
Local: (508) 689-4616
Fax: (508) 689-9282
coombs@armycourtmartialdefense.com
www.armycourtmartialdefense.com

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From: coombs@armycourtmartialdefense.com
Sent: Thursday, September 15, 2011 10:55 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Subject: [Suspected SPAM] RE: chat

Ashden,

Tomorrow at 1600 works for me. If that time is not good for you, we can shoot for anytime in the morning on Monday.

Best,
David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Toll Free: 1-800-588-4156
Local: (508) 689-4616
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From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Thursday, September 15, 2011 11:15 PM
To: 'coombs@armycourtmaritaldefense.com'
Subject: Re: [Suspected SPAM] RE: chat

David. 1600 works. I will double check the bates number tomorrow. The document is a 4137- cid collection doc, but not an interview.

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Friday, September 18, 2011 8:02 AM
To: coombs@armycourtmartialdefense.com
Cc: Matthew kemkes; Tooman,Joshua J CPT MIL US USA TRADOC; paul.r.bouchard@us.army.mil; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Subject: RE: [Suspected SPAM] RE: US v. PFC BM (Excludable Delay and Document Issue)
Importance: High

David,

The actual document is BATES 24445. Please purge your systems of 24445 and the new CDs will go out today.

v/r
Ashden

From: coombs@armycourtmartialdefense.com
Sent: Friday, September 16, 2011 9:25 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: Matthew kemkes <matthew.kemkes@us.army.mil>; Tooman,Joshua J CPT MIL US
USA TRADOC <joshua.tooman@us.army.mil>; paul.r.bouchard@us.army.mil; Morrow
III, JoDean, CPT USA JFHQ-NCR/MDW SJA <JoDean.Morrow@jfhqncr.northcom.mil>; Overgaard, Angel M. CPT USA JFHQ-
NCR/MDW SJA <Angel.Overgaard@jfhqncr.northcom.mil>; Ford, Arthur D. WO1
USA JFHQ-NCR/MDW SJA <Arthur.Ford@jfhqncr.northcom.mil>
Subject: RE: [Suspected SPAM] RE: US v. PFC BM (Excludable Delay and Document Issue)

Ashden,

I have complied with your request.

Best,

David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Toll Free: 1-800-588-4156
Local: (508) 689-4616
Fax: (508) 689-9282
coombs@armycourtmartialdefense.com
www.armycourtmartialdefense.com

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From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Friday, September 16, 2011 9:32 AM
To: coombs@armycourtmartialdefense.com
Cc: Matthew kemkes; Tooman,Joshua J CPT MIL US USA TRADOC; paul.r.bouchard@us.army.mil; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Subject: RE: [Suspected SPAM] RE: US v. PFC BM (Excludable Delay and Document Issue)

Thank you.

From: Tooman, Joshua J CPT MIL US USA TRADOC <joshua.tooman@us.army.mil>
Sent: Friday, September 16, 2011 10:50 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqnrc.northcom.mil>; coombs@armycourtmaritaldefense.com
Cc: Matthew kemkes <matthew.kemkes@us.army.mil>; paul.r.bouchard@us.army.mil; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA <JoDean.Morrow@jfhqnrc.northcom.mil>; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA <Angel.Overgaard@jfhqnrc.northcom.mil>; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA <Arthur.Ford@jfhqnrc.northcom.mil>
Subject: Re: [Suspected SPAM] RE: US v. PFC BM (Excludable Delay and Document Issue)

Ashden

I have complied with your request.

V/r
Josh

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Friday, September 16, 2011 1:59 PM
To: coombs@armycourtmartialdefense.com
Cc: Matthew kemkes; Tooman,Joshua J CPT MIL US USA TRADOC; paul.r.bouchard@us.army.mil; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Subject: US v. PFC BM (Excludable Delay and Document Issue)
Attachments: 11-Sep-16-Defense Classified Computer Usage.pdf
Importance: High

David and MAJ Kemkes,

Attached is a memorandum outlining the specialized computer equipment we are providing the defense to review classified information and to provide to the civilian forensic computer experts to handle classified information. We intend to deliver the first batch of classified discovery today with the computer equipment. Please let me know if you have any questions.

v/r
Ashden

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Friday, September 16, 2011 3:02 PM
To: 'coombs@armycourtmartialdefense.com'; Kemkes, Matthew J MAJ MIL USA
Cc: 'Tooman,Joshua J CPT MIL US USA TRADOC'; 'paul.r.bouchard@us.army.mil'; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Subject: RE: US v. PFC BM (Excludable Delay and Document Issue)

Importance: High

MAJ Kemkes,

CW2 Santiago informed us that she does not have the combination to the safe; therefore, we cannot deliver the classified disks today. Please let us know when you are available so that we can deliver the equipment and first round of classified information.

Thank you!

v/r
Ashden

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Friday, September 16, 2011 5:15 PM
To: 'coombs@armycourtmartialdefense.com'
Subject: phone call

David,

I am sorry I did not call earlier. We are having network issues. I am still available today and this weekend. If you want to set a time for Monday, please let me know- I am available anytime.

Thanks!

Ashden

From: coombs@armycourtmartialdefense.com
Sent: Friday, September 16, 2011 5:20 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Subject: Re: phone call

No worries. If you can talk now, give me a call. Otherwise, anytime Monday morning works for me.

Best,
David
Sent from my Verizon Wireless BlackBerry

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Friday, September 16, 2011 5:22 PM
To: 'coombs@armycourtmartialdefense.com'
Subject: Re: phone call

I can chat. Will call in 3.

From: Kemkes, Mathew J MAJ MIL USA [mathew.kemkes@us.army.mil]
Sent: Monday, September 19, 2011 8:50 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Cc: coombs@armycourtmartialdefense.com; Tooman, Joshua J CPT MIL US USA TRADOC; paul.r.bouchard@us.army.mil; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Subject: RE: US v. PFC BM (Excludable Delay and Document Issue) (UNCLASSIFIED)
Signed By: mathew.kemkes@us.army.mil

Classification: UNCLASSIFIED

Caveats: FOUO

CPT Fein,

I am back in the office and will be here all day. I have some client appointments so I suggest you call before just stopping by.

Respectfully,
MAJ Kemkes

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Monday, September 19, 2011 8:54 AM
To: Kemkes, Matthew J MAJ MIL USA
Cc: coombs@armycourtmartialdefense.com; Tooman, Joshua J CPT MIL US USA TRADOC; paul.r.bouchard@us.army.mil; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Subject: RE: US v. PFC BM (Excludable Delay and Document Issue) (UNCLASSIFIED)

Sir,

Thanks. We will call. If possible, I would like to stop by around 10?
Thanks.

Ashden

From: Kemkes, Matthew J MAJ MIL USA [matthew.kemkes@us.army.mil]
Sent: Monday, September 19, 2011 9:02 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Cc: coombs@armycourtmarialdefense.com; Tooman, Joshua J CPT MIL US USA TRADOC; paul.r.bouchard@us.army.mil; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Subject: RE: US v. PFC BM (Excludable Delay and Document Issue) (UNCLASSIFIED)
Signed By: matthew.kemkes@us.army.mil

Classification: UNCLASSIFIED

Caveats: FOUO

CPT Fein,

1000 sounds good.

Respectfully,
MAJ Kemkes

From: Bouchard, Paul R CPT MIL USA OSA <paul.r.bouchard@us.army.mil>
Sent: Monday, September 19, 2011 9:05 AM
To: Eric Lakes <edl@cyberagentsinc.com>
Cc: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <ashden.fein@jfhqncr.northcom.mil>
Subject: Please respond to Mr. Lakes' inquiry, computers

Ashden:

Please see e-mail below from Eric Lakes. Will he and Trent be using Government computers or their own computers?
Thanks.

Paul

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Monday, September 19, 2011 9:41 AM
To: Bouchard, Paul R CPT MIL USA OSA; Eric Lakes
Cc: coombs@armycourtmartialdefense.com; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Kemkes, Matthew J MAJ MIL USA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Subject: RE: Please respond to Mr. Lakes' inquiry, computers

Paul,

That is incorrect. As we discussed on the phone, we are providing two harddrives and all the software. The three computers we are providing are for the defense team to view classified information and process any information during the process.

v/r
Ashden

-----Original Message-----

From: Bouchard, Paul R CPT MIL USA OSA [\[mailto:paul.r.bouchard@us.army.mil\]](mailto:paul.r.bouchard@us.army.mil)
Sent: Monday, September 19, 2011 9:05 AM
To: Eric Lakes
Cc: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Subject: Please respond to Mr. Lakes' inquiry, computers

Ashden:

Please see e-mail below from Eric Lakes. Will he and Trent be using Government computers or their own computers?

Thanks,
Paul

----- Original Message -----

From: Eric Lakes edl@cyberagentsinc.com
Date: Monday, September 19, 2011 7:45
Subject: RE: US v. PFC BM (Excludable Delay and Document Issue)
To: "Bouchard, Paul R CPT MIL USA OSA" [\[mailto:paul.r.bouchard@us.army.mil\]](mailto:paul.r.bouchard@us.army.mil)

> So I am to assume they want us to use their computers now and not
> ours is
> that correct?

>
>
>
>
>

> -----Original Message-----

> **From:** Bouchard, Paul R CPT MIL USA OSA
> [\[mailto:paul.r.bouchard@us.army.mil\]](mailto:paul.r.bouchard@us.army.mil)
> **Sent:** Sunday, September 18, 2011 11:22 PM
> **To:** edl@cyberagentsinc.com
> **Subject:** Fwd: US v. PFC BM (Excludable Delay and Document Issue)
>
> Eric:

>
> I hope this includes the attachment. If not, I'll e-mail it to you
> tomorrow morning.
> Paul

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Monday, September 19, 2011 9:42 AM
To: Kemkes, Matthew J MAJ MIL USA
Cc: coombs@armycourtmartialdefense.com; Tooman, Joshua J CPT MIL US USA TRADOC; paul.r.bouchard@us.army.mil; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Subject: RE: US v. PFC BM (Excludable Delay and Document Issue) (UNCLASSIFIED)

Sir,

It looks more like 1030. Also can you have CW2 Santiago and SSG Purcell there- I have blackberries for them (from SSG Phillips) and they need to sign for them.

Thanks!

v/r
Ashden

From: Eric Lakes <edl@cyberagentsinc.com>
Sent: Monday, September 19, 2011 9:44 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>; Bouchard, Paul R CPT MIL USA OSA <paul.r.bouchard@us.army.mil>; Eric Lakes <edl@cyberagentsinc.com>
Cc: coombs@armycourtmartialdefense.com; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA <JoDean.Morrow@jfhqncr.northcom.mil>; Matthew kemkes <matthew.kemkes@us.army.mil>; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA <Arthur.Ford@jfhqncr.northcom.mil>
Subject: RE: Please respond to Mr. Lakes' inquiry, computers

Ashden if you could send us the Hard Drives and Software to preload on the hard drives before we come to Ft Meade that could save a lot of time there and let us get everything after they are installed up to date on their (software) patches etc . .

Eric Lakes
Digital Forensic Examiner
Certified Computer Examiner (CCE)
Certified Homeland Security - III
MCSE, MCP+, MCP, Network Plus, A+
Cyber Agents, Inc.
<http://www.cyberagentsinc.com>
616 Pasadena Drive
Lexington, KY 40503
cell - 859.983.6655
land line - 859.523.9081 or 9082

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Monday, September 19, 2011 9:52 AM
To: edi@cyberagentsinc.com; Bouchard, Paul R CPT MIL USA OSA
Cc: coombs@armycourtmartialdefense.com; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW
SJA; Matthew kemkes; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Subject: RE: Please respond to Mr. Lakes' inquiry. computers

Eric,

We will be delivering the harddrives and software to MAJ Kemkes this morning.

V/r
Ashden

From: Kemkes, Matthew J MAJ MIL USA [matthew.kemkes@us.army.mil]
Sent: Monday, September 19, 2011 9:58 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Cc: coombs@armycourtmartialdefense.com; Tooman, Joshua J CPT MIL US USA TRADOC; paul.r.bouchard@us.army.mil; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Subject: RE: US v. PFC BM (Excludable Delay and Document Issue) (UNCLASSIFIED)
Signed By: matthew.kemkes@us.army.mil

Classification: UNCLASSIFIED

Caveats: FOUO

CPT Fein,

I have a client coming at 1100 which is why I agreed to 1000. If you can finish what we need to do in 30 minutes then let's knock it out.

CW2 Santiago will be here to sign for the BBs.

Respectfully,
MAJ Kemkes

From: Bouchard, Paul R CPT MIL USA OSA <paul.r.bouchard@us.army.mil>
Sent: Monday, September 19, 2011 9:58 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Subject: Re: RE: Please respond to Mr. Lakes' inquiry, computers

Thanks, Ashden.
Paul

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Monday, September 19, 2011 10:12 AM
To: Kemkes, Matthew J MAJ MIL USA
Cc: coombs@armycourtmartialdefense.com; Tooman, Joshua J CPT MIL US USA TRADOC; paul.r.bouchard@us.army.mil; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Subject: RE: US v. PFC BM (Excludable Delay and Document Issue) (UNCLASSIFIED)

Sir,

We only need 10 minutes. We are leaving now.

From: Kemkes, Matthew J MAJ MIL USA [matthew.kemkes@us.army.mil]
Sent: Monday, September 19, 2011 10:18 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Cc: Tooman, Joshua J CPT MIL US USA TRADOC; paul.r.bouchard@us.army.mil; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; coombs@armycourtmartialdefense.com; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; melissa.s.santiago@mail.us.army.mil
Subject: RE: [Suspected SPAM] RE: US v. PFC BM (Excludable Delay and Document Issue) (UNCLASSIFIED)
Signed By: matthew.kemkes@us.army.mil

Classification: UNCLASSIFIED

Caveats: FOUO

CPT Fein,

We destroyed our digital copy of the file containing BATES 24445. We had no paper copies to destroy. CPT Bouchard has the actual CD and he will destroy it and confirm its destruction today.

Respectfully,
MAJ Kemkes

From: Bouchard, Paul R CPT MIL USA OSA <paul.r.bouchard@us.army.mil>
Sent: Monday, September 19, 2011 3:43 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <ashden.fein@jfhqncr.northcom.mil>;
Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA <arthur.ford@jfhqncr.northcom.mil>
Cc: coombs@armycourtmartialdefense.com; Matthew kemkes
<matthew.kemkes@us.army.mil>
Subject: Destruction of disk, US v. Manning (UNCLASSIFIED)

Classification: UNCLASSIFIED
CPT Fein, Mister Ford:

I have completely destroyed the unclassified disk containing the files 24363-24862; I do not have the files on my computer.
Please confirm receipt of this e-mail.

Respectfully,

CPT Paul Bouchard
Defense Counsel
Trial Defense Services
Fort Meade Field Office
301-677-9231
Classification: UNCLASSIFIED

From: Kemkes, Matthew J MAJ MIL USA [matthew.kemkes@us.army.mil]
Sent: Tuesday, September 20, 2011 4:52 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Cc: coombs@armycourtmartialdefense.com; paul.r.bouchard@us.army.mil; Tooman, Joshua J
Subject: Courier Cards (UNCLASSIFIED)
Attachments: Request for Courier Cards.pdf
Signed By: matthew.kemkes@us.army.mil

Classification: UNCLASSIFIED

Caveats: FOUO

CPT Fein,

As we discussed yesterday, please find my request for courier cards attached.

Respectfully,

MAJ Matthew J. Kemkes
Senior Defense Counsel, NCR
U.S. Army Trial Defense Service
Fort Myer, Virginia
Office: (703) 696-6700/3038

Classification: UNCLASSIFIED

Caveats: FOUO

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Wednesday, September 21, 2011 9:48 AM
To: Kemkes, Matthew J MAJ MIL USA
Cc: coombs@armycourtmartialdefense.com; paul.r.bouchard@us.army.mil; Tooman, Joshua J CPT MIL US USA TRADOC; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Subject: RE: Courier Cards (UNCLASSIFIED)

Sir,

Acknowledge receipt and we are processing.

v/r
Ashden

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Wednesday, September 21, 2011 11:14 AM
To: coombs@armycourtmartialdefense.com
Cc: Matthew kemkes; Tooman,Joshua J CPT MIL US USA TRADOC;
paul.r.bouchard@us.army.mil; Morow III, JoDean, CPT USA JFHQ-NCR/MDW SJA;
Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-
NCR/MDW SJA
Subject: US v. PFC BM (Discovery)

David,

On Monday, we delivered two classified CDs containing and 00024383-00024459 (file containing information we requested be deleted from everyone's computer) and 00044865-00045301 (portions of military intelligence investigations). Yesterday, we sent you (tracking: 7010 1060 0001 1274 3999) 00021364-00036617 (majority of CID Case file with redacted classified file) and delivered a copy to Fort Myer. We also delivered a new copy of 00036618-00042806 because of CAC encryption certificate errors.

Thank you.

V/r
Ashden

From: coombs@armycourtmartialdefense.com
Sent: Wednesday, September 21, 2011 11:34 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: Matthew kemkes <matthew.kemkes@us.army.mil>; Tooman, Joshua J CPT MIL US
USA TRADOC <joshua.tooman@us.army.mil>; paul.r.bouchard@us.army.mil; Morrow
III, JoDean, CPT USA JFHQ-NCR/MDW SJA <JoDean.Morrow@jfhqncr.northcom.mil>; Overgaard, Angel M. CPT USA JFHQ-
NCR/MDW SJA <Angel.Overgaard@jfhqncr.northcom.mil>; Ford, Arthur D. WO1
USA JFHQ-NCR/MDW SJA <Arthur.Ford@jfhqncr.northcom.mil>; Melissa Santiago
<melissa.s.santiago@us.army.mil>
Subject: [Suspected SPAM] RE: US v. PFC BM (Discovery)

Ashden,

Thank you. I just wanted to make sure that I am accurately tracking with what was provided by the Government. If I understand you correctly, you have provided the following:

- a) MAJ Kemkes: Gave him two classified CDs (these CDs represent bates number 044865 to 045301) and you provided a new CD 024383-024459 to account for the document that you requested the defense to destroy.
- b) My Office: A CD that is 021364 to 036617. I remember last week we talked about sending one large copy of everything provided so far to the defense, but this CD is obviously not everything. Why is all of this information being provided again? Other than the one document that you asked us to destroy, 02445, are all the other documents identical? Is document 02445 now just a blank document so that the bates numbers for previously provided documents have not changed? You indicate that you have also sent another CD 036618 to 042806. Why is this discovery being sent again? I have already received a replacement CD from Mr. Ford due to the CAC encryption certificate errors.

Best,
David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Toll Free: 1-800-588-4156
Local: (508) 689-4616
Fax: (508) 689-9282
coombs@armycourtmartialdefense.com
www.armycourtmartialdefense.com

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From: coombs@armycourtmartialdefense.com
Sent: Wednesday, September 21, 2011 1:52 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: Matthew kemkes <matthew.kemkes@us.army.mil>; Tooman, Joshua J CPT MIL US USA TRADOC <joshua.tooman@us.army.mil>; paul.r.bouchard@us.army.mil; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA <JoDean.Morrow@jfhqncr.northcom.mil>; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA <Angel.Overgaard@jfhqncr.northcom.mil>; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA <Arthur.Ford@jfhqncr.northcom.mil>; Melissa Santiago <melissa.s.santiago@us.army.mil>; Eric Lakes <edl@cyberagentsinc.com>
Subject: Preserve Evidence Request
Attach: Preserve Evidence - 21 Sep.pdf

Ashden,

Please see the attached request.

Best,
David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Toll Free: 1-800-588-4156
Local: (508) 689-4616
Fax: (508) 689-9282
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From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Thursday, September 22, 2011 6:09 PM
To: coombs@armycourtmartialdefense.com
Cc: Matthew kemkes; Tooman, Joshua J CPT MIL US USA TRADOC; paul.r.bouchard@us.army.mil; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; Melissa Santiago; Eric Lakes
Subject: RE: Preserve Evidence Request

David,

Could you please clarify your request. Are you asking to have ALL harddrives that were located in the TSCIF and TOC or only those that were collected by CID and had EnCase forensic images produced? Thank you.

v/r
Ashden

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Thursday, September 22, 2011 7:20 PM
To: coombs@armycourtmartialdefense.com
Cc: Matthew kemkes; Tooman,Joshua J CPT MIL US USA TRADOC; paul.r.bouchard@us.army.mil; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; Melissa Santiago
Subject: RE: [Suspected SPAM] RE: US v. PFC BM (Discovery)

David,

Below is an explanation of your comments and questions:

- a) MAJ Kemkes: You are accurate. 024383-024459 is reproduced on a classified CD so you have a copy of the original documents- no alteration except classified markings.
- b) Your Office: We did not send 036618 to 042806 to you, we delivered a copy to Ft. Myer for CW2 Santiago. She could not access the document because they were not encrypted with her certificates. We needed to provide another copy so she could read the documents. 024445, on the unclassified side, is a redacted document. The rest of the documents in that batch (021364 to 036617) are the same. We provided another copy of the file because the original CD needs to be destroyed, since it contained classified information. We want to make sure you have all the documents so we re-sent the same batch with 024445 redacted.

v/r
Ashden

From: coombs@armycourtmartialdefense.com
Sent: Friday, September 23, 2011 10:09 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: Matthew kemkes <matthew.kemkes@us.army.mil>; Tooman,Joshua J CPT MIL US USA TRADOC <joshua.tooman@us.army.mil>; paul.r.bouchard@us.army.mil; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA <JoDean.Morrow@jfhqncr.northcom.mil>; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA <Angel.Overgaard@jfhqncr.northcom.mil>; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA <Arthur.Ford@jfhqncr.northcom.mil>; Melissa Santiago <melissa.s.santiago@us.army.mil>; Eric Lakes <edl@cyberagentsinc.com>
Subject: [Suspected SPAM] RE: Preserve Evidence Request

Ashden,

The defense request is for all hard drives that were located within the T-SCIF and the TOC.

Best,
David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Toll Free: 1-800-588-4156
Local: (508) 689-4616
Fax: (508) 689-9282
coombs@armycourtmartialdefense.com
www.armycourtmartialdefense.com

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From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Friday, September 23, 2011 10:45 AM
To: coombs@armycourtmartialdefense.com
Cc: Matthew kemkes; Tooman,Joshua J CPT MIL US USA TRADOC; paul.r.bouchard@us.army.mil; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; Melissa Santiago; Eric Lakes
Subject: RE: [Suspected SPAM] RE: Preserve Evidence Request

Thank you.

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Monday, September 26, 2011 5:35 PM
To: carl.coffman@us.army.mil
Cc: coombs@armycourtmaritaldefense.com; Matthew kernkes; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; paul.r.bouchard@us.army.mil; Haberland, John CPT MIL USA; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Tooman, Joshua J CPT MIL US USA TRADOC
Subject: US v. PFC BM (Art 32 Delay Request)
Attachments: 110926-Government Request to Delay Article 32.pdf
Importance: High

Sir,

The United States requests a delay of the Article 32. Please see the attached request. Our digital scanner does not work, so I am providing an unsigned but final version. I will send an updated signed copy tomorrow.

v/r
CPT Fein

Ashden Fein
CPT, JA

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Tuesday, September 27, 2011 7:39 AM
To: 'carl.coffman@us.army.mil'
Cc: 'coombs@armycourtmartialdefense.com'; Matthew kemkes; Morrow III, JoDean, CPT USA
JFHQ-NCR/MDW SJA; 'paul.r.bouchard@us.army.mil'; 'Haberland,John CPT MIL USA';
Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Tooman, Joshua J CPT MIL US
USA TRADOC
Subject: US v. PFC BM (Art 32 Delay Request)
Attachments: 110926-Government Request to Delay Article 32.pdf

Sir,

Attached is a signed version. Thank you.

v/r
Ashden

From: coombs@armycourtmartialdefense.com
Sent: Tuesday, September 27, 2011 11:54 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: Matthew kemkes <matthew.kemkes@us.army.mil>; Paul Bouchard <paul.r.bouchard.mil@mail.mil>; Joshua Tooman <joshua.tooman@us.army.mil>
Subject: Rumor Mill

Ashden,

I am hearing that the Government is arranging to move PFC Manning for a meeting. This sounds like the arrangements for the briefing on the classified evidence. However, the rumor that I am hearing is that this meeting is with the UN Special Rapporteur on Torture. Any truth to this rumor?

Best,
David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Toll Free: 1-800-588-4156
Local: (508) 689-4616
Fax: (508) 689-9282
coombs@armycourtmartialdefense.com
www.armycourtmartialdefense.com

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From: coombs@armycourtmartialdefense.com
Sent: Tuesday, September 27, 2011 12:27 PM
To: carl.coffman@us.army.mil
Cc: Matthew kemkes <matthew.kemkes@us.army.mil>; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA <JoDean.Morrow@jfhqncr.northcom.mil>; paul.r.bouchard@us.army.mil; Haberland,John CPT MIL USA <john.haberland@us.army.mil>; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA <Angel.Overgaard@jfhqncr.northcom.mil>; Tooman,Joshua J CPT MIL US USA TRADOC <joshua.tooman@us.army.mil>; Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Subject: [Suspected SPAM] RE: US v. PFC BM (Art 32 Delay Request)

Sir,

The Defense maintains its previous position that any additional delay should not be excluded under R.C.M. 707 (c). Instead, the requested delay should be credited to the Government for speedy trial purposes under Article 10 of the Uniform Code of Military Justice.

V/R
David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Toll Free: 1-800-588-4156
Local: (508) 689-4616
Fax: (508) 689-9282
coombs@armycourtmartialdefense.com
www.armycourtmartialdefense.com

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From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Tuesday, September 27, 2011 3:01 PM
To: coombs@armycourtmartialdefense.com
Cc: Matthew kemkes; Paul Bouchard; Joshua Tooman; Haberland, John CPT USA Regimental
Judge Advocate
Subject: RE: Rumor Mill

David,

Just rumor. No plans for movement or special meetings. We don't know where
that RUMINT came from.

v/r
Ashden

From: Bouchard, Paul R CPT USA MIL (US) <paul.r.bouchard.mil@mail.mil>
Sent: Wednesday, September 28, 2011 4:12 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <ashden.fein@jfhqncr.northcom.mil>
Cc: Robertson, Calder L III USA CIV (US) <calder.l.robertson.civ@mail.mil>; Shaver, David S USA CIV (US) <david.s.shaver.civ@mail.mil>; Pittman, Ryan D USA CIV (US) <ryan.d.pittman4.civ@mail.mil>; Antonio.P.EDWARDS@us.army.mil; Ellis, Kirk N USA CIV (US) <kirk.n.ellis.civ@mail.mil>; Williams, Stephen C USA CIV (US) <stephen.c.williams.civ@mail.mil>; Wilbur, John J USA CIV (US) <john.j.wilbur2.civ@mail.mil>; al.williamson@us.army.mil; Clapper, Charles M USA CIV (US) <charles.m.clapper.civ@mail.mil>; ken.kim@us.army.mil; Bettencourt, Troy M USA CIV (US) <troy.m.bettencourt.civ@mail.mil>; Mairena, Tamara R USA CIV (US) <tamara.r.mairena.civ@mail.mil>
Subject: CPT Bouchard wants to talk to 13 Government witnesses, US v. PFC Bradley Mannin (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: FOUO

Ashden – FYI and heads up

I need to speak to the individuals listed on the cc line vis-à-vis the Manning case. As you know, we have equal access to these persons as you do with any potential defense witnesses.

I have phone numbers for these individuals and will begin calling them tomorrow, 29 September. My questions will be in the area of computer forensics.

I do not have any contact information – telephone or e-mail address – for Mr. Mark Johnson. He apparently works at the Computer Crimes Investigative Unit at Quantico, VA. Any contact information on Mr. Johnson is greatly appreciated.

Respectfully,
CPT Paul Bouchard
Defense Counsel
Trial Defense Services
Fort Meade Field Office
Fort Meade, Maryland
Office: 301-677-9231
Classification: UNCLASSIFIED
Caveats: FOUO

From: Kim, Hyung K SFC USA MIL (US) [hyung.k.kim4.mil@mail.mil]
Sent: Wednesday, September 28, 2011 4:17 PM
To: Bouchard, Paul R CPT USA MIL (US); Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Cc: Robertson, Calder L III USA CIV (US); Shaver, David S USA CIV (US); Pittman, Ryan D
USA CIV (US); antonio.p.edwards@us.army.mil; Ellis, Kirk N USA CIV (US); Williams,
Stephen C USA CIV (US); Wilbur, John J USA CIV (US); al.williamson@us.army.mil;
Clapper, Charles M USA CIV (US); ken.kim@us.army.mil; Bettencourt, Troy M USA CIV
(US); Mairena, Tamara R USA CIV (US)
Subject: RE: CPT Bouchard wants to talk to 13 Government witnesses, US v. PFC Bradley Mannin
(UNCLASSIFIED)
Signed By: ken.kim@us.army.mil

Classification: UNCLASSIFIED

Caveats: FOUO

Sir,

I PCS'ed to CA since December 2010 and below is my new POC.

V/R,

Kim

Acting Resident Agent in Charge
Laguna Niguel Fraud Resident Agency
U.S. Army CID
(O) 949-360-6346
(C) 949-648-8396
ken.kim@us.army.mil

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Wednesday, September 28, 2011 4:58 PM
To: Bouchard, Paul R CPT USA MIL (US)
Cc: Robertson, Calder L III USA CIV (US); Shaver, David S USA CIV (US); Pittman, Ryan D USA CIV (US); antonio.p.edwards@us.army.mil; Ellis, Kirk N USA CIV (US); Williams, Stephen C USA CIV (US); Wilbur, John J USA CIV (US); al.williamson@us.army.mil; Clapper, Charles M USA CIV (US); ken.kim@us.army.mil; Bettencourt, Troy M USA CIV (US); Mairena, Tamara R USA CIV (US); Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA
Subject: RE: CPT Bouchard wants to talk to 13 Government witnesses, US v. PFC Bradley Mannin (UNCLASSIFIED)

CPT Bouchard,

Thank you for the heads up. We will work to comply with this request to the best of our ability, while balancing the ongoing nature of this investigation, other investigations by the United States Government, and national security.

v/r
CPT Fein

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Wednesday, September 28, 2011 5:08 PM
To: 'Almanza, Paul'
Cc: Matthew kemkes; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA;
paul.r.bouchard@us.army.mil; Haberland, John CPT MIL USA; Overgaard, Angel M. CPT
USA JFHQ-NCR/MDW SJA; Tooman, Joshua J CPT MIL US USA TRADOC;
coombs@armycourtmaritaldefense.com
Subject: US v. PFC BM (Art 32 Delay)
Attachments: 110928-SPCMCA Delay of Article 32 Investigation.pdf

Sir,

Good afternoon. The SPCMCA granted an additional delay of the Article 32 investigation. Please see attachment.

v/r
CPT Fein

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Wednesday, September 28, 2011 5:09 PM
To: coombs@armycourtmartialdefense.com
Cc: Matthew kernkes; Tooman,Joshua J CPT MIL US USA TRADOC;
paul.r.bouchard@us.army.mil; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA;
Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-
NCR/MDW SJA; Melissa Santiago; Eric Lakes
Subject: RE: [Suspected SPAM] RE: Preserve Evidence Request

David,

Are you available to discuss this request over the telephone?

Thanks.

v/r
Ashden

From: coombs@armycourtmartialdefense.com
Sent: Thursday, September 29, 2011 8:08 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: Matthew kemkes <matthew.kemkes@us.army.mil>; Tooman, Joshua J CPT MIL US USA TRADOC <joshua.tooman@us.army.mil>; paul.r.bouchard@us.army.mil; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA <JoDean.Morrow@jfhqncr.northcom.mil>; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA <Angel.Overgaard@jfhqncr.northcom.mil>; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA <Arthur.Ford@jfhqncr.northcom.mil>; Melissa Santiago <melissa.s.santiago@us.army.mil>; Eric Lakes <edl@cyberagentsinc.com>
Subject: RE: [Suspected SPAM] RE: Preserve Evidence Request

Ashden,

I am available between 1200 and 1300 or anytime after 1600 today.

Best,
David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Toll Free: 1-800-588-4156
Local: (508) 689-4616
Fax: (508) 689-9282
coombs@armycourtmartialdefense.com
www.armycourtmartialdefense.com

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From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Thursday, September 29, 2011 9:31 AM
To: coombs@armycourtmaritaldefense.com
Cc: Matthew kemkes; Tooman,Joshua J CPT MIL US USA TRADOC;
paul.r.bouchard@us.army.mil; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA;
Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-
NCR/MDW SJA; Melissa Santiago; Eric Lakes
Subject: RE: [Suspected SPAM] RE: Preserve Evidence Request

David,

Thanks. How is 1230?

v/r
Ashden

From: coombs@armycourtmartialdefense.com
Sent: Thursday, September 29, 2011 9:41 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: Matthew kemkes <matthew.kemkes@us.army.mil>; Tooman, Joshua J CPT MIL US USA TRADOC <joshua.tooman@us.army.mil>; paul.r.bouchard@us.army.mil; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA <JoDean.Morrow@jfhqncr.northcom.mil>; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA <Angel.Overgaard@jfhqncr.northcom.mil>; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA <Arthur.Ford@jfhqncr.northcom.mil>; Melissa Santiago <melissa.s.santiago@us.army.mil>; Eric Lakes <edl@cyberagentsinc.com>
Subject: RE: [Suspected SPAM] RE: Preserve Evidence Request

1230 works fine for me.

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Toll Free: 1-800-588-4156
Local: (508) 689-4616
Fax: (508) 689-9282
coombs@armycourtmartialdefense.com
www.armycourtmartialdefense.com

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From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Thursday, September 29, 2011 9:43 AM
To: 'coombs@armycourtmartialdefense.com'
Subject: Re: [Suspected SPAM] RE: Preserve Evidence Request

Thanks.

From: Almanza, Paul <Paul.Almanza@usdoj.gov>
Sent: Thursday, September 29, 2011 11:15 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: Matthew kemkes <matthew.kemkes@us.army.mil>; Morrow III, JoDean, CPT USA
JFHQ-NCR/MDW SJA <JoDean.Morrow@jfhqncr.northcom.mil>;
paul.r.bouchard@us.army.mil; john.haberland@us.army.mil; Overgaard, Angel M. CPT
USA JFHQ-NCR/MDW SJA <Angel.Overgaard@jfhqncr.northcom.mil>;
joshua.tooman@us.army.mil; coombs@armycourtmartialdefense.com
Subject: Re: US v. PFC BM (Art 32 Delay)

Thank you, CPT Fein.

LTC Almanza

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Thursday, September 29, 2011 4:40 PM
To: coombs@armycourtmartialdefense.com
Cc: Matthew kemkes; Tooman,Joshua J CPT MIL US USA TRADOC;
paul.r.bouchard@us.army.mil; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA;
Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-
NCR/MDW SJA; Melissa Santiago; Eric Lakes
Subject: RE: [Suspected SPAM] RE: Preserve Evidence Request

David,

Thanks for the chat this afternoon. To recap, you are requesting the preservation of the following items:

1. All SIPR hard drives in the TOC and SCIF of 2/10 MTN, regardless if they were seized or imaged
2. All EnCase forensic images of all computers seized by the United States

v/r
Ashden

From: coombs@armycourtmartialdefense.com
Sent: Thursday, September 29, 2011 4:43 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: Matthew kemkes <matthew.kemkes@us.army.mil>; Tooman,Joshua J CPT MIL US USA TRADOC <joshua.tooman@us.army.mil>; paul.r.bouchard@us.army.mil; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA <JoDean.Morrow@jfhqncr.northcom.mil>; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA <Angel.Overgaard@jfhqncr.northcom.mil>; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA <Arthur.Ford@jfhqncr.northcom.mil>; Melissa Santiago <melissa.s.santiago@us.army.mil>; Eric Lakes <edl@cyberagentsinc.com>
Subject: RE: [Suspected SPAM] RE: Preserve Evidence Request

Ashden,

Your understanding of the Defense request to preserve evidence is correct.

Best,
David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Toll Free: 1-800-588-4156
Local: (508) 689-4616
Fax: (508) 689-9282
coombs@armycourtmartialdefense.com
www.armycourtmartialdefense.com

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From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Thursday, September 29, 2011 6:18 PM
To: 'coombs@armycourtmartialdefense.com'; 'matthew.kemkes@conus.army.mil'
Cc: Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Overgaard, Angel M. CPT USA
JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Subject: Fw: CPT Bouchard wants to talk to 13 Government witnesses, US v. PFC Bradley Mannin
(UNCLASSIFIED)

David,

Please see below. If you have any questions, please let us know.

Vr
Ashden

From: coombs@armycourtmartialdefense.com
Sent: Friday, September 30, 2011 8:27 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA
<JoDean.Morrow@jfhqncr.northcom.mil>; Overgaard, Angel M. CPT USA JFHQ-
NCR/MDW SJA <Angel.Overgaard@jfhqncr.northcom.mil>; Ford, Arthur D. WO1
USA JFHQ-NCR/MDW SJA <Arthur.Ford@jfhqncr.northcom.mil>;
matthew.kemkes@conus.army.mil; Paul Bouchard <paul.r.bouchard.mil@mail.mil>
Subject: [Suspected SPAM] Agent Interviews

Ashden,

I don't see the necessity for Mr. Andrews' request to work through Mr. King. My main concern is that coordinating with Mr. King will unnecessarily add a layer to the entire process. The agents that we want to speak with are stationed in Alaska, Hawaii, Japan, Germany, Iraq, Afghanistan, and throughout CONUS.

Why is it necessary for Mr. King, as the SAC of CCIU, to coordinate interviews for each of these witnesses? If Mr. King wanted to coordinate the interviews of CCIU agents in his office, then this would make somewhat more sense. However, it appears that Mr. Andrews' email is addressing all CID agents. Also, I am troubled by his statement that "Kenny will coordinate the requests, as appropriate." Does this mean that one or more agents will not cooperate with a defense interview request?

Best,
David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Toll Free: 1-800-588-4156
Local: (508) 689-4616
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coombs@armycourtmartialdefense.com
www.armycourtmartialdefense.com

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From: Kemkes, Mathew J MAJ MIL USA [mathew.kemkes@us.army.mil]
Sent: Friday, September 30, 2011 4:25 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Cc: coombs@armycourtmartialdefense.com; Santiago, Melissa S CW2 RES USA
Subject: Request for Supplies (UNCLASSIFIED)
Attachments: Request for Supplies.pdf
Signed By: mathew.kemkes@us.army.mil

Follow Up Flag: Follow up
Flag Status: Completed

Classification: UNCLASSIFIED
Caveats: FOUO

CPT Fein,

Please see the attached request.

Respectfully,

MAJ Matthew J. Kemkes
Senior Defense Counsel, NCR
U.S. Army Trial Defense Service
Fort Myer, Virginia
Office: (703) 696-6700/3038

Classification: UNCLASSIFIED
Caveats: FOUO

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Friday, September 30, 2011 5:40 PM
To: Matthew kemkes
Cc: 'coombs@armycourtmartiakdefense.com'; 'melissa.s.santiago@us.army.mil'; Ford, Arthur D.
Subject: WO1 USA JFHQ-NCR/MDW SJA; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA
Re: Request for Supplies (UNCLASSIFIED)

Sir. Ack.

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Sunday, October 02, 2011 8:13 PM
To: 'coombs@armycourtmartialdefense.com'
Cc: Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; 'matthew.kemkes@conus.army.mil'; 'paul.r.bouchard.mil@mail.mil'
Subject: Re: Agent Interviews

David,

I appreciate your concern; however, rather than an unnecessary added layer, CCIU's response seems to be a more efficient means by which to coordinate the interviews of numerous agents. As you accurately stated, agents are stationed worldwide, and coordinating interviews in different time zones, particularly with deployed individuals, can be very time-consuming. SA King will be able to de-conflict schedules for you and ensure the availability of the appropriate individuals at a time convenient for you.

Also, this is still an ongoing national security investigation involving other law enforcement agencies and equities, and classification reviews are still ongoing. It seems much more burdensome and time-consuming for you to ask an agent a question and have to wait for him to determine whether his response is classified or whether the information in his response has been approved for released before he can answer your question.

In his email, SA Andrews refers to the unresolved classification and national security issues. The "as appropriate" language, therefore, likely refers to these concerns and ensuring agent responses do not compromise any information that cannot be released at this point in time.

CCIU is aware of the Article 32, Article 46, and the accused's right of equal access to witnesses; however, given the national security concerns and pending approvals and classification reviews, SA King's coordination seems necessary to ensure all equities are protected while also ensuring your ability to prepare for the Article 32.

Please let me know if you have any further questions or concerns.

Vr
Ashden

From: coombs@armycourtmartialdefense.com
Sent: Sunday, October 2, 2011 11:48 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA
<JoDean.Morrow@jfhqncr.northcom.mil>; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA <Angel.Overgaard@jfhqncr.northcom.mil>; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA <Arthur.Ford@jfhqncr.northcom.mil>; matthew.kemkes@conus.army.mil; paul.r.bouchard.mil@mail.mil
Subject: [Suspected SPAM] RE: Agent Interviews

Ashden,

I am all for efficiency, and I appreciate CCIU's interest in assisting the Defense in coordinating the interviews of numerous agents. I want to make sure that I understand how this process is intended to work. Is SA King simply setting up convenient times for us to interview the requested agents or will he also have some additional role? How is coordinating through SA King going to avoid a situation where an agent needs to determine whether his response is classified or not? How is coordinating through SA King going to ensure that an agent's response does not compromise any information that cannot be released at this point in time?

Best,
David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Toll Free: 1-800-588-4156
Local: (508) 689-4616
Fax: (508) 689-9282
coombs@armycourtmartialdefense.com
www.armycourtmartialdefense.com

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From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Monday, October 03, 2011 8:05 AM
To: 'coombs@armycourtmartialdefense.com'
Cc: Matthew kemkes; Tooman,Joshua J CPT MIL US USA TRADOC;
'paul.r.bouchard@us.army.mil'; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA;
Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-
NCR/MDW SJA
Subject: US v. PFC BM (Discovery)

David,

On Friday, we re-sent to you (tracking: 7010 1060 0001 1274 4002) all the material that we have produced thus far (00000001-00044864). We will deliver a copy to MAJ Kemkes this morning. As we discussed on the phone, this re-production and future productions will have each individual document separated into its own PDF.

v/r
Ashden

we delivered two classified CDs containing and 00024383-00024459 (file containing information we requested be deleted from everyone's computer) and 00044865-00045301 (portions of military intelligence investigations). Yesterday, we sent you (tracking: 7010 1060 0001 1274 3999) 00021364-00036617 (majority of CID Case file with redacted classified file) and delivered a copy to Fort Myer. We also delivered a new copy of 00036618-00042806 because of CAC encryption certificate errors.

Thank you.

V/r
Ashden

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Tuesday, October 04, 2011 7:22 AM
To: Kemkes, Matthew J MAJ MIL USA
Cc: coombs@armycourtmartialdefense.com; Santiago, Melissa S CW2 RES USA; Parra, Jairo A. WO1 USA JFHQ-NCR/MDW SJA
Subject: RE: Request for Supplies (UNCLASSIFIED)

Sir,

We are working this request. Once the government credit card is turned back on and funded, we will act immediately.

v/r
Ashden

From: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Sent: Tuesday, October 04, 2011 7:34 PM
To: 'coombs@armycourtmartialdefense.com'; Matthew kemkes; Paul Bouchard; joshua.tooman@us.army.mil; Cherise.m.purcell@us.army.mil; 'Santiago, Melissa S CW2 RES USA'
Cc: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA; Feito, Beatriz SGT USA JFHQ- NCR/MDW SJA
Subject: EDVA Protective Orders (UNCLASSIFIED)
Attachments: 10GJ3793.pdf; 10sw396.pdf; 10GJ3793-mk.pdf; 11EC131.pdf
Signed By: arthur.ford@Jfhqncr.northcom.mil

Classification: UNCLASSIFIED

Caveats: FOUO

Everyone,

Attached are four disclosure and protective orders. As before, please initial each page, sign the last page, scan, and email back to me. Thank you very much.

V/R,

Arthur Ford
WO1, JA
Legal Administrator
Comm: 202-685-1975
BB: 571-289-9690

Classification: UNCLASSIFIED

Caveats: FOUO

From: Paul Bouchard <bouchardp@yahoo.com>
Sent: Wednesday, October 5, 2011 11:24 AM
To: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
<Arthur.Ford@jfhqncr.northcom.mil>; coombs@armycourtmartialdefense.com;
Matthew kemkes <matthew.kemkes@us.army.mil>; joshua.tooman@us.army.mil;
Cherise.m.purcell@us.army.mil; Santiago, Melissa S CW2 RES USA
<melissa.s.santiago@us.army.mil>
Cc: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>;
Feito, Beatriz SGT USA JFHQ- NCR/MDW SJA
<Beatriz.Feito@jfhqncr.northcom.mil>; paul.r.bouchard.mil@mail.mil;
paul.r.bouchard@us.army.mil
Subject: Re: EDVA Protective Orders (UNCLASSIFIED)
Attach: PO1.pdf, PO2.pdf, PO3.pdf, PO4.pdf

Mister Ford:

Per your request. My best e-mail addresses are on the cc line: paul.r.bouchard@us.army.mil and/or paul.r.bouchard.mil@mail.mil

Respectfully,
CPT Paul Bouchard
Defense Counsel

From: coombs@armycourtmartialdefense.com
Sent: Wednesday, October 5, 2011 2:40 PM
To: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
<Arthur.Ford@jfhqncr.northcom.mil>
Cc: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>;
Feito, Beatriz SGT USA JFHQ- NCR/MDW SJA
<Beatriz.Feito@jfhqncr.northcom.mil>; Matthew kemkes
<matthew.kemkes@us.army.mil>; Paul Bouchard <bouchardp@yahoo.com>;
joshua.tooman@us.army.mil; Cherise.m.purcell@us.army.mil; Santiago,Melissa S CW2
RES USA <melissa.s.santiago@us.army.mil>
Subject: RE: EDVA Protective Orders (UNCLASSIFIED)
Attach: Protective Order - Coombs.pdf

Mr. Ford,

As requested, I have attached the four signed protective orders.

Best,
David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Toll Free: 1-800-588-4156
Local: (508) 689-4616
Fax: (508) 689-9282
coombs@armycourtmartialdefense.com
www.armycourtmartialdefense.com

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From: Tooman, Joshua J CPT MIL US USA TRADOC [joshua.tooman@us.army.mil]
Sent: Wednesday, October 05, 2011 5:03 PM
To: Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; coombs@armycourtmartialdefense.com; Matthew kemkes; Paul Bouchard; Purcell, Cherise M SSG RES USA; Santiago, Melissa S CW2 RES USA
Cc: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA; Feito, Beatriz SGT USA JFHQ- NCR/MDW SJA
Subject: RE: EDVA Protective Orders (UNCLASSIFIED)
Attachments: Protective Orders_Tooman_October.pdf
Signed By: joshua.tooman@us.army.mil

Classification: UNCLASSIFIED

Caveats: FOUO

Mr. Ford

Signed protective orders are attached, per your request.

v/r
CPT Tooman

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Thursday, October 06, 2011 10:41 AM
To: coombs@armycourtmartialdefense.com
Cc: Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; matthew.kemkes@conus.army.mil; paul.r.bouchard.mil@mail.mil; Tooman, Joshua J CPT MIL US USA TRADOC
Subject: RE: [Suspected SPAM] RE: Agent Interviews
Importance: High

David,

First, in reference to your questions below, it appears that SA King will be the arbiter on what is protected information and not. I recommend contacting SA King about the agent interview process, as he will best be able to address your specific questions. If you still have any unanswered questions or concerns after talking to him, I will be more than happy to assist in trying to clear up any potential issues.

Additionally, we received the final CCIU forensic reports and started preparing them for approval and production. Over the next two weeks, we should have all the final approvals to turn over the information to you and your team. We should be ready to meet with you and turn over the classified forensic reports on 3-4 November 2011.

We would like to schedule that Thursday and Friday to assist the defense in getting through the voluminous material we are preparing to provide. If the defense is willing to meet, we will be able to orient you to the facts of the case, the layout of the reports, and give a brief overview of the prosecution's case. This should overall speed up the pre-trial process and minimize any future delays.

Please let me know if that date will work. We do not expect to have all the approvals back and the documents ready for release, prior to 3 November.

Thank you.

v/r
Ashden

From: coombs@armycourtmartialdefense.com
Sent: Thursday, October 6, 2011 11:21 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA
<JoDean.Morrow@jfhqncr.northcom.mil>; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA <Angel.Overgaard@jfhqncr.northcom.mil>; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA <Arthur.Ford@jfhqncr.northcom.mil>; matthew.kemkes@conus.army.mil; paul.r.bouchard.mil@mail.mil; Tooman, Joshua J CPT MIL US USA TRADOC <joshua.tooman@us.army.mil>
Subject: RE: [Suspected SPAM] RE: Agent Interviews

Ashden,

We will contact Mr. King to determine the process that he envisions for being the "arbitrator" for our CID interviews. If we have a problem with this process, we will alert you to the nature of our concerns.

Given the fact that you do not expect to have all of the approvals back and the documents ready for release prior to 3 November, how confident are you in the 3-4 November date? I suggest we schedule our meeting for at least one week later on the 9th and 10th of November or even the 17th and 18th of November. This would allow for the following:

- a) The Government to know for sure that they have the necessary approvals back and documents ready for release;
- b) The defense team (experts and myself) to make the necessary travel arrangements with confidence that our travel plans will not need to be cancelled; and
- c) The defense team to review the majority of the classified discovery prior to the meeting in order to get the most out of the Government's presentation.

Your thoughts?

Best,
David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
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Toll Free: 1-800-588-4156
Local: (508) 689-4616
Fax: (508) 689-9282
coombs@armycourtmartialdefense.com
www.armycourtmartialdefense.com

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From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Thursday, October 06, 2011 12:41 PM
To: coombs@armycourtmartialdefense.com
Cc: Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Overgaard, Angel M. CPT USA
JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA;
matthew.kernkes@conus.army.mil; paul.r.bouchard.mil@mail.mil; Tooman, Joshua J CPT
MIL US USA TRADOC
Subject: RE: [Suspected SPAM] RE: Agent Interviews

David,

This might be better discussed over the phone. Are you available today? Thank you.

v/r
Ashden

From: coombs@armycourtmartialdefense.com
Sent: Thursday, October 6, 2011 12:53 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqnqr.northcom.mil>
Cc: Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA
<JoDean.Morrow@jfhqnqr.northcom.mil>; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA <Angel.Overgaard@jfhqnqr.northcom.mil>; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA <Arthur.Ford@jfhqnqr.northcom.mil>; matthew.kemkes@conus.army.mil; paul.r.bouchard.mil@mail.mil; Tooman,Joshua J CPT MIL US USA TRADOC <joshua.tooman@us.army.mil>
Subject: RE: [Suspected SPAM] RE: Agent Interviews

Are you available at 1430?

David E. Coombs, Esq.
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11 South Angell Street, #317
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From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Thursday, October 06, 2011 1:05 PM
To: coombs@armycourtmartialdefense.com
Cc: Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; matthew.kemkes@conus.army.mil; paul.r.bouchard.mil@mail.mil; Tooman, Joshua J CPT MIL US USA TRADOC
Subject: RE: [Suspected SPAM] RE: Agent Interviews

David,

I am. I will call at 1430.

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Thursday, October 06, 2011 3:23 PM
To: coombs@armycourtmartialdefense.com
Cc: Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; matthew.kernkes@conus.army.mil; paul.r.bouchard.mil@mail.mil; Tooman, Joshua J CPT MIL US USA TRADOC
Subject: RE: [Suspected SPAM] RE: Agent Interviews

David,

Thanks for the phone meeting. Please read below, and let me know if this is an accurate recount:

1. The United States should be ready to turnover the classified forensic evidence by 3 Nov 11. When it is ready, we will work to provide the production to the defense at Fort Myer. Because of the New Developments course that week, you rather meet the following week for the prosecution to discuss the case, as outlined below, with the defense.
2. We will plan on meeting on 8-9 Nov. The defense team will be present, with or without the computer forensic experts and the security experts.
3. Depending on the outcome of the meeting, you might want to have your client flown out to the NCR to sit down and receive the same briefing/explanation of the forensic evidence. That decision will be made after the initial meeting.
4. Assuming the prosecution receives the final classification review, we the approvals to turn over classified information, we will be ready to move immediately into the Article 32 investigation. The prosecution will notify the SPCMCA and the Article 32 will likely be ordered to occur soon after the 8-9 Nov meeting.
5. The prosecution will make available the classified evidence as soon as we receive the approvals and have it prepared to turn-over, even if before 3 Nov.

Thank you.

v/r
Ashden

From: coombs@armycourtmartialdefense.com
Sent: Thursday, October 6, 2011 4:02 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA
<JoDean.Morrow@jfhqncr.northcom.mil>; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA <Angel.Overgaard@jfhqncr.northcom.mil>; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA <Arthur.Ford@jfhqncr.northcom.mil>; matthew.kemkes@conus.army.mil; paul.r.bouchard.mil@mail.mil; Tooman, Joshua J CPT MIL US USA TRADOC <joshua.tooman@us.army.mil>
Subject: RE: [Suspected SPAM] RE: Agent Interviews

Ashden,

I agree with your synopsis of our conversation.

If the classified discovery is provided to the defense prior to our meeting, I will come down to look through the information. Additionally, the defense will be ready to conduct the Article 32 as soon as the SPCMCA orders it to begin. Once we receive the witness list from the Article 32 Officer, the defense will submit its witness list.

Best,
David

David E. Coombs, Esq.
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Providence, RI 02906
Toll Free: 1-800-588-4156
Local: (508) 689-4616
Fax: (508) 689-9282
coombs@armycourtmartialdefense.com
www.armycourtmartialdefense.com

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From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Thursday, October 06, 2011 4:05 PM
To: coombs@armycourtmartialdefense.com
Cc: Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; matthew.kemkes@conus.army.mil; paul.r.bouchard.mil@mail.mil; Tooman, Joshua J CPT MIL US USA TRADOC
Subject: RE: [Suspected SPAM] RE: Agent Interviews

Thank you.

From: Rains, Larry E Mr CIV USA DCS G-2 [larry.rains@us.army.mil]
Sent: Thursday, October 13, 2011 12:45 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Cc: ts@cyberagentsinc.com; Pittman, Jamil A Mr CIV US USA DCS G-2
Subject: (U) Struttman granted Secret Clearance
Signed By: larry.rains@us.army.mil

Classification: UNCLASSIFIED//FOR OFFICIAL USE ONLY

Ashden,

Re: PFC Manning Case

Mr. Struttman has been granted a Secret security clearance by Army CCF.

Best regards,
Larry

Larry Rains
Security Manager/SSR
HQDA, ODCS, G-2
1000 Army Pentagon
Washington DC 20310-1000
Comm: 703-695-1125
Fax: 703-695-2648

Classification: UNCLASSIFIED//FOR OFFICIAL USE ONLY

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Thursday, October 13, 2011 12:58 PM
To: Rains, Larry E Mr CIV USA DCS G-2
Cc: ts@cyberagentsinc.com; Pittman, Jamil A Mr CIV US USA DCS G-2
Subject: RE: (U) Strutman granted Secret Clearance

Larry,

Thank you.

v/r
Ashden

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Thursday, October 13, 2011 1:09 PM
To: 'coombs@armycourtmartialdefense.com'
Cc: Matthew kemkes; Tooman,Joshua J CPT MIL US USA TRADOC;
'paul.r.bouchard@us.army.mil'; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA;
Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-
NCR/MDW SJA; 'Melissa Santiago'
Subject: US v. PFC BM (Discovery)

David,

Yesterday, we sent to you (tracking # 7010 1060 0001 1274 4019) and delivered to MAJ Kemkes unclassified discovery (BATES: 00045302-00045581). These documents are miscellaneous documents from the CID case file. We also re-delivered the three classified laptops to the TDS office and verified that CW2 Santiago could log on to one of them.

v/r
Ashden

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Thursday, October 13, 2011 1:09 PM
To: 'coombs@armycountmartialdefense.com'
Cc: Matthew kemkes; Tooman,Joshua J CPT MIL US USA TRADOC'; 'paul.r.bouchard@us.army.mil'; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; 'Melissa Santiago' US v. PFC BM (Discovery)

David,

Yesterday, we sent to you (tracking # 7010 1060 0001 1274 4019) and delivered to MAJ Kemkes unclassified discovery (BATES: 00045302-00045581). These documents are miscellaneous documents from the CID case file. We also re-delivered the three classified laptops to the TDS office and verified that CW2 Santiago could log on to one of them.

v/r
Ashden

From: coombs@armycourtmartialdefense.com
Sent: Thursday, October 13, 2011 1:35 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: Matthew kemkes <matthew.kemkes@us.army.mil>; Tooman, Joshua J CPT MIL US USA TRADOC <joshua.tooman@us.army.mil>; paul.r.bouchard@us.army.mil; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA <JoDean.Morrow@jfhqncr.northcom.mil>; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA <Angel.Overgaard@jfhqncr.northcom.mil>; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA <Arthur.Ford@jfhqncr.northcom.mil>; Melissa Santiago <melissa.s.santiago@us.army.mil>
Subject: RE: US v. PFC BM (Discovery)
Attach: 13 Oct Discovery Request.pdf

Ashden,

Thank you for the update. Please see the attached discovery request. Let me know if you have any questions.

Best,
David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Toll Free: 1-800-588-4156
Local: (508) 689-4616
Fax: (508) 689-9282
coombs@armycourtmartialdefense.com
www.armycourtmartialdefense.com

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From: coombs@armycourtmartialdefense.com
Sent: Thursday, October 13, 2011 1:35 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Cc: Matthew kemkes; Tooman,Joshua J CPT MIL US USA TRADOC;
paul.r.bouchard@us.army.mil; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA;
Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-
NCR/MDW SJA; Melissa Santiago
Subject: RE: US v. PFC BM (Discovery)
Attachments: 13 Oct Discovery Request.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Ashden,

Thank you for the update. Please see the attached discovery request. Let me know if you have any questions.

Best,
David

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From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Monday, October 17, 2011 9:45 AM
To: coombs@armycourtmaritaldefense.com
Cc: Matthew kemkes; Tooman,Joshua J CPT MIL US USA TRADOC;
paul.r.bouchard@us.army.mil; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA;
Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-
NCR/MDW SJA; Melissa Santiago
Subject: RE: US v. PFC BM (Discovery)

David,

We acknowledge receipt of this discovery request and are working to process.

v/r
Ashden

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Monday, October 17, 2011 9:45 AM
To: 'coombs@armycourtmartialdefense.com'
Cc: Matthew kemkes; Tooman,Joshua J CPT MIL US USA TRADOC'; 'paul.r.bouchard@us.army.mil'; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; 'Melissa Santiago'
Subject: RE: US v. PFC BM (Discovery)

David,

We acknowledge receipt of this discovery request and are working to process.

v/r
Ashden

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Tuesday, October 18, 2011 9:23 AM
To: coombs@armycourtmartialdefense.com
Cc: Matthew kemkes; Tooman,Joshua J CPT MIL US USA TRADOC;
paul.r.bouchard@us.army.mil; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA;
Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-
NCR/MDW SJA; Melissa Santiago
Subject: US v. PFC BM
Attachments: 111014-Excludable Delay Memorandum.pdf

David,

Attached is the SPCMCA excludable delay accounting memo.

v/r
Ashden

From: coombs@armycourtmartialdefense.com
Sent: Tuesday, October 18, 2011 9:32 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqnqr.northcom.mil>
Cc: Matthew kemkes <matthew.kemkes@us.army.mil>; Tooman, Joshua J CPT MIL US USA
TRADOC <joshua.tooman@us.army.mil>; paul.r.bouchard@us.army.mil; Morrow III, JoDean,
CPT USA JFHQ-NCR/MDW SJA <JoDean.Morrow@jfhqnqr.northcom.mil>; Overgaard, Angel
M. CPT USA JFHQ-NCR/MDW SJA <Angel.Overgaard@jfhqnqr.northcom.mil>; Ford, Arthur
D. WO1 USA JFHQ-NCR/MDW SJA <Arthur.Ford@jfhqnqr.northcom.mil>; Melissa Santiago
<melissa.s.santiago@us.army.mil>
Subject: [Suspected SPAM] RE: US v. PFC BM

Ashden,

Thank you. I also wanted to let you know that I received the unclassified discovery discs last week (00000001-00044864 and 00045301-00045581).

Best,
David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
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From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Tuesday, October 18, 2011 9:37 AM
To: coombs@armycourtmartialdefense.com
Cc: Matthew kemkes; Tooman,Joshua J CPT MIL US USA TRADOC;
paul.r.bouchard@us.army.mil; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA;
Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-
NCR/MDW SJA; Melissa Santiago
Subject: RE: [Suspected SPAM] RE: US v. PFC BM

Thank you.

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Friday, October 21, 2011 7:03 AM
To: 'coombs@armycourtmartialdefense.com'
Cc: Matthew kemkes; 'Tooman,Joshua J CPT MIL US USA TRADOC'; 'paul.r.bouchard@us.army.mil'; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Subject: US v. PFC BM (Discovery)

David,

Yesterday, we sent to you (tracking: 7010 1060 0001 1274 4026) miscellaneous CID documents from their case file (00045582-00046073). We also delivered a copy to MAJ Kemkes. Have a good weekend.

v/r
Ashden

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Friday, October 21, 2011 7:03 AM
To: 'coombs@armycourtmartialdefense.com'
Cc: Matthew kemkes; Tooman,Joshua J CPT MIL US USA TRADOC';
'paul.r.bouchard@us.army.mil'; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA;
Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-
NCR/MDW SJA
Subject: US v. PFC BM (Discovery)

David,

Yesterday, we sent to you (tracking: 7010 1060 0001 1274 4026) miscellaneous
CID documents from their case file (00045582-00046073). We also delivered a
copy to MAJ Kemkes. Have a good weekend.

v/r
Ashden

From: Tooman, Joshua J CPT USA MIL (US) <joshua.j.tooman.mil@mail.mil>
Sent: Friday, October 21, 2011 7:04 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <ashden.fein@jfhqncr.northcom.mil>
Subject: Automatic reply: US v. PFC BM (Discovery)

I am currently on leave, 19 October 2011 - 2 November 2011, and will not have email access for the majority of this time. I will return to the office on 3 November 2011. If you need immediate assistance, please contact Mr. Eddie Young at 913-684-1866.

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Friday, October 21, 2011 9:54 AM
To: Kemkes, Matthew J MAJ MIL USA
Cc: 'coombs@armycourtmartialdefense.com'; 'Tooman,Joshua J CPT MIL US USA TRADOC'; 'paul.r.bouchard@us.army.mil'; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA
Subject: US v. PFC BM (Classified Material Supply Request)

MAJ Kemkes,

We processed and ordered the material you requested to handle classified material. We expect to have the supplies in and ready to be picked up by the end of next week. We will notify Cw2 Santiago once it is all ready to be picked up.

v/r
Ashden

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Tuesday, October 25, 2011 6:11 PM
To: 'carl.coffman@us.army.mil'
Cc: 'coombsb@armycourtmartialdefense.com'; Matthew Kermes; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; 'paul.r.bouchard@us.army.mil'; 'Haberland, John CPT MIL USA'; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; 'Tooman, Joshua J CPT MIL US USA TRADOC'
Subject: US v. PFC BM (Art 32 Delay Request)
Attachments: 111025-Government Request to Delay Article 32.pdf
Importance: High

Sir,

The United States requests a delay of the Article 32. Please see the attached request.

v/r
CPT Fein

Ashden Fein
CPT, JA

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Tuesday, October 25, 2011 6:15 PM
To: 'coombs@armycourtmartialdefense.com'
Cc: Matthew kernkes; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA;
'paul.r.bouchard@us.army.mil'; 'Haberland,John CPT MIL USA'; Overgaard, Angel M. CPT
USA JFHQ-NCR/MDW SJA; 'Tooman, Joshua J CPT MIL US USA TRADOC'
Subject: US v. PFC BM (8-9 Nov 11 Meeting)
Attachments: 111025-Proposed Meeting with Defense.pdf

David,

Good evening. Attached is a memorandum that captures our previous discussions and outlines some ground rules for our 8-9 Nov 11 meeting. Although we expect the meeting only to take one day, we are planning for two. The location and time is TBD. Please let me know if you have any questions.

-Break-

Additionally, we are working to receive the final approval for the forensic reports and other classified information. We hope to have this information by 1 Nov. Once we receive the approval, we will start production and have it ready for your team before the end of the week. Please let us know when you would like us to schedule, if at all, your forensic computer experts to travel out to Fort Meade.

v/r
Ashden

From: coombs@armycourtmartialdefense.com
Sent: Tuesday, October 25, 2011 6:45 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: Matthew kemkes <matthew.kemkes@us.army.mil>; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA <JoDean.Morrow@jfhqncr.northcom.mil>; paul.r.bouchard@us.army.mil; Haberland, John CPT MIL USA <john.haberland@us.army.mil>; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA <Angel.Overgaard@jfhqncr.northcom.mil>; Tooman, Joshua J CPT MIL US USA TRADOC <joshua.tooman@us.army.mil>
Subject: [Suspected SPAM] RE: US v. PFC BM (8-9 Nov 11 Meeting)
Attach: TC Presentation.pdf

Ashden,

The terms of our November meeting as proposed in your memorandum are acceptable to the defense. I have attached my signed acknowledgement.

I will be traveling to D.C. on the 7th along with other defense experts to conduct a review, prior to our meeting, of the classified discovery. Please let me know if anything affects the time line for the Government's disclosure of the classified discovery. CPT Bouchard will contact you later this week in regards to the forensic review by Mr. Lakes and Mr. Struttman.

Let me know if you have any questions.

Best,
David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Toll Free: 1-800-588-4156
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From: coombs@armycourtmartialdefense.com
Sent: Tuesday, October 25, 2011 6:49 PM
To: carl.coffman@us.army.mil
Cc: Matthew kemkes <matthew.kemkes@us.army.mil>; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA <JoDean.Morrow@jfhqncr.northcom.mil>; paul.r.bouchard@us.army.mil; Haberland,John CPT MIL USA <john.haberland@us.army.mil>; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA <Angel.Overgaard@jfhqncr.northcom.mil>; Tooman,Joshua J CPT MIL US USA TRADOC <joshua.tooman@us.army.mil>; Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>
Subject: [Suspected SPAM] RE: US v. PFC BM (Art 32 Delay Request)

Sir,

The defense maintains its previous position that any additional delay should not be excluded under R.C.M. 707 (c). Instead, the requested delay should be credited to the Government for speedy trial purposes under Article 10 of the Uniform Code of Military Justice.

V/R
David

David E. Coombs, Esq.
Law Office of David E. Coombs
11 South Angell Street, #317
Providence, RI 02906
Toll Free: 1-800-588-4156
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From: Bouchard, Paul R CPT MIL USA OSA <paul.r.bouchard@us.army.mil>
Sent: Wednesday, October 26, 2011 12:01 PM
To: coombs@armycourtmartialdefense.com; Fein, Ashden CPT USA JFHQ-NCR/MDW
SJA <Ashden.Fein@jfhqncr.northcom.mil>
Cc: Matthew kemkes <matthew.kemkes@us.army.mil>; Tooman@us.army.mil, Joshua J
CPT MIL US USA TRADOC@us.army.mil,@us.army.mil
Subject: RE: US v. PFC BM (8-9 Nov 11 Meeting) (UNCLASSIFIED)
Attach: Terms of Nov8-9[1].pdf

Classification: UNCLASSIFIED

Ashden:

My signed copy of the terms of our Nov. 8-9 meeting is attached.

I will call you today or tomorrow vis-a-vis the forensic review.

Thanks.

Paul

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Wednesday, October 26, 2011 12:35 PM
To: Bouchard, Paul R CPT MIL USA OSA; coombs@armycourtmartialdefense.com
Cc: Matthew kemkes; "Tooman@us.army.mil, Joshua J CPT MIL US USA
Subject: TRADOC@us.army.mil, "@us.army.mil
RE: US v. PFC BM (8-9 Nov 11 Meeting) (UNCLASSIFIED)

Thanks.

From: COFFMAN, CARL R COL MIL USA IMCOM <carl.coffman@us.army.mil>
Sent: Wednesday, October 26, 2011 4:37 PM
To: coombs@armycourtmartialdefense.com
Cc: Matthew kemkes <matthew.kemkes@us.army.mil>; Morrow III, JoDean, CPT USA
JFHQ-NCR/MDW SJA <JoDean.Morrow@jfhqncr.northcom.mil>;
paul.r.bouchard@us.army.mil; Haberland, John CPT MIL USA
<john.haberland@us.army.mil>; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW
SJA <Angel.Overgaard@jfhqncr.northcom.mil>; Tooman, Joshua J CPT MIL US USA
TRADOC <joshua.tooman@us.army.mil>; Fein, Ashden CPT USA JFHQ-NCR/MDW
SJA <Ashden.Fein@jfhqncr.northcom.mil>
Subject: RE: US v. PFC BM (Art 32 Delay Request) (UNCLASSIFIED)

Classification: UNCLASSIFIED

Thanks.
Coffman

On 10/25/11, coombs@armycourtmartialdefense.com wrote:

> Sir,
>
>
> The defense maintains its previous position that any additional delay should not be excluded under R.C.M. 707(c). Instead, the
requested delay should be credited to the Government for speedy trial purposes under Article 10 of the Uniform Code of Military
Justice.
>
>
> V/R
> David
>
>
> David E. Coombs, Esq.
> Law Office of David E. Coombs
> 11 South Angell Street, #317
> Providence, RI 02906
> Toll Free: 1-800-588-4156
> Local: (508) 689-4616
> Fax: (508) 689-9282
> coombs@armycourtmartialdefense.com(blockedmailto:coombs@armycourtmartialdefense.com)
> www.armycourtmartialdefense.com(blockedhttp://www.armycourtmartialdefense.com)
>
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>
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From: Bouchard, Paul R CPT USA MIL (US) <paul.r.bouchard.mil@mail.mil>
Sent: Wednesday, October 26, 2011 4:51 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <ashden.fein@jfhqncr.northcom.mil>
Subject: Message from CPT Paul Bouchard (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: FOUO

Ashden:

Give me a call tomorrow when you get a chance. I would like to discuss computer forensics Logistics with you.

Thanks,

Paul

Classification: UNCLASSIFIED

Caveats: FOUO

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Wednesday, October 26, 2011 4:52 PM
To: 'paul.r.bouchard.mil@mail.mil'
Subject: Re: Message from CPT Paul Bouchard (UNCLASSIFIED)

No prob. Thx.

From: Bouchard, Paul R CPT USA MIL (US) <paul.r.bouchard.mil@mail.mil>
Sent: Thursday, October 27, 2011 12:08 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <ashden.fein@jfhqnrc.northcom.mil>
Subject: Please call me, CPT Paul Bouchard (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: FOUO

Ashden:

Please call me when you can. If I'm at lunch, my cell phone number is 915-603-7651.

I need particulars on: when will we get the classified data, where the Nov. 8 meeting will be, etc.
Thanks,

Paul

Classification: UNCLASSIFIED

Caveats: FOUO

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Thursday, October 27, 2011 12:16 PM
To: Bouchard, Paul R CPT USA MIL (US)
Subject: RE: Please call me, CPT Paul Bouchard (UNCLASSIFIED)

Paul,

Calling now. Sorry about the delay. I have been in and out of the office since yesterday.

Ashden

From: Bouchard, Paul R CPT USA MIL (US) <paul.r.bouchard.mil@mail.mil>
Sent: Thursday, October 27, 2011 2:44 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <ashden.fein@jfhqncr.northcom.mil>
Subject: Message from CPT Paul Bouchard (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: FOUO

Ashden:

Please call me again. Just want to go over a few things – five minutes tops.

Thanks,

paul

Classification: UNCLASSIFIED

Caveats: FOUO

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Thursday, October 27, 2011 2:49 PM
To: 'Kemkes, Matthew J MAJ MIL USA';
Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; 'paul.r.bouchard@us.army.mil';
'Haberland,John CPT MIL USA'; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA;
'Tooman,Joshua J CPT MIL US USA TRADOC'
Subject: US v. PFC BM (Defense Supplies)

MAJ Kemkes,

The following items have been purchased/acquired and are ready to be picked up:

1. Five courier bags (3 large, 2 normal)
2. Printer (Dell 3130cn)
3. Shredder (Olympia 671.1CF)
4. Open/Close Magnet
5. Pack of SF-704
6. Courier Cards for you and CW2 Santiago

You may pickup these items at your convenience, please call first so WO1 Parra or SGT Waybright can ensure that someone is here to sign over the supplies/equipment.

v/r,

Ashden

From: Bouchard, Paul R CPT USA MIL (US) <paul.r.bouchard.mil@mail.mil>
Sent: Thursday, October 27, 2011 3:01 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <ashden.fein@jfhqncr.northcom.mil>
Subject: Message from CPT Paul Bouchard (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: FOUO

Ashden:

1. When do you think the Defense's computer forensics team (Eric Lakes and Trent Struttmann) will be able to do their forensics? I know you said you'll have the classified data for us by Nov. 3-4. Just wondering if there's anything else we'll need for Eric and Trent to do their work.
2. Trent told me Eric already booked their (Eric and Trent's) travel for the meeting on Nov. 8 and possibly the 9th. Flights to BWI, hotel, and car rental come out at \$1332.75. They're expecting per diem for food and at cost for gas. Are you okay with this? Again, they booked it in advance.

Thanks,

Paul

Classification: UNCLASSIFIED

Caveats: FOUO

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Thursday, October 27, 2011 3:01 PM
To: Bouchard, Paul R CPT USA MIL (US)
Subject: RE: Message from CPT Paul Bouchard (UNCLASSIFIED)

Paul,

Please call so we can chat. Thanks.

From: Bouchard, Paul R CPT USA MIL (US) <paul.r.bouchard.mil@mail.mil>
Sent: Thursday, October 27, 2011 4:04 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <ashden.fein@jfhqncr.northcom.mil>
Cc: coombs@armycourtmartialdefense.com; edl@cyberagentsinc.com;
ts@cyberagentsinc.com; Santiago, Melissa S CW2 USA MIL (US)
<melissa.s.santiago@us.army.mil>
Subject: Message from CPT Paul Bouchard (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: FOUO

Ashden:

It was good talking to you. Just a few things.

1. Do you foresee Eric and Trent getting on and off post easily for the Nov. 8 meeting? Both Eric and Trent will attend the Nov. 8 meeting, and it is my understanding that the meeting will be either at Fort Belvoir or the Military District of Washington. Eric and Trent will be in a car rental. Do they a need a pass to get on base or a CAC equivalent for contractors/visitors? If so, will this take a lot of time? Anyway we can streamline the process? Just want their travel and on/off post access to be efficient.
2. Computer stuff. I Understand that the Government will give us the classified data by the end of next week. What I want to ensure is that the data (apparently a hard drive containing all of the pertinent forensic images) includes ALL of the computers in question. For efficiency and cost-effective purposes, we want Eric and Trent to come to the DC area once so they can do their forensics. I know lead defense counsel, David Coombs, asked for all of the computers in the TSCIF. Will we get that – the forensic images of all of the computers, not just the computer PFC Manning was assigned to?
3. Understand the Defense Travel Issue (DTS) issue. Awaiting your e-mail on that.

Appreciate any feedback.

Thanks,

Paul

Classification: UNCLASSIFIED

Caveats: FOUO

From: Eric Lakes <edl@cyberagentsinc.com>
Sent: Thursday, October 27, 2011 4:15 PM
To: Bouchard, Paul R CPT USA MIL (US) <paul.r.bouchard.mil@mail.mil>; Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <ashden.fein@jfhqncr.northcom.mil>
Cc: coombs@armycourtmartialdefense.com; edl@cyberagentsinc.com; ts@cyberagentsinc.com; Santiago, Melissa S CW2 USA MIL (US) <melissa.s.santiago@us.army.mil>
Subject: re: Message from CPT Paul Bouchard (UNCLASSIFIED)

Basically Ashden I am in the DEERS system but Trent is not - we need him entered so you can get us both sponsored so we can get our Contractors ID Cards before we leave Lexington.

Thanks in advance;

Eric Lakes
Digital Forensic Examiner
Certified Computer Examiner (CCE)
Certified Homeland Security - III
MCSE, MCP+, MCP, Network Plus, A+
Cyber Agents, Inc.
<http://www.cyberagentsinc.com>
616 Pasadena Drive
Lexington, KY 40503
cell - 859.983.6655
land line - 859.523.9081 or 9082

From: Bouchard, Paul R CPT USA MIL (US) <paul.r.bouchard.mil@mail.mil>
Sent: Thursday, October 27, 2011 4:20 PM
To: edl@cyberagentsinc.com; Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
<ashden.fein@jfhqncr.northcom.mil>; Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
<ashden.fein@jfhqncr.northcom.mil>
Cc: ts@cyberagentsinc.com
Subject: RE: Message from CPT Paul Bouchard (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: FOUO

Ashden:

Please respond to e-mail below. Eric is in DEERs but Trent isn't. This is about the ID issue to get on and off post.

Thanks,

Paul

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Thursday, October 27, 2011 5:43 PM
To: 'edi@cyberagentsinc.com'; 'Bouchard, Paul R CPT USA MIL (US)'
Cc: 'coombs@armycourtmartiakdefense.com'; 'ts@cyberagentsinc.com'; 'Santiago, Melissa S CW2 USA MIL (US)'; Parra, Jairo A. WO1 USA JFHQ-NCR/MDW SJA
Subject: RE: Message from CPT Paul Bouchard (UNCLASSIFIED)

All- I am preparing a more detailed email, but this should be a non-issue. All the installations within the National Capital Region allow the public to drive on post, even with rental cars. More importantly, our meeting on the 7th and 8th will not be a on a military installation, but rather at Metro Park near Fort Belvoir. More details to follow.

Thanks!

Ashden

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Thursday, October 27, 2011 5:55 PM
To: 'coombs@armycourtmartialdefense.com'; 'Kermkes, Matthew J MAJ MIL USA'; 'Bouchard, Paul R CPT USA MIL (US)'; 'Tooman, Joshua J CPT MIL US USA TRADOC'
Cc: Feito, Beatriz SGT USA JFHQ- NCR/MDW SJA; Parra, Jairo A. WO1 USA JFHQ- NCR/MDW SJA; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA
Subject: US v. PFC BM (Party, Witness, Expert Travel)
Attachments: ITO Worksheet.pdf

All-

To facilitate the travel prosecution and defense witnesses and experts, the OSJA has put in place procedures that should make travel simple and efficient.

For civilian personnel, not associated with DoD- this will be accomplish through DTS. SGT Feito (prosecution paralegal) is authorized to create travel orders for non-DOD civilians. She must have each traveler's full name, SSN, address, and banking information and other information in the ITO worksheet (attached). SGT Feito will directly assist the individual with reservations for hotel and lodging. Depending on the situation and timing, MDW, OSJA might directly pay for the flight rather than the individual paying through DTS.

For all Military or DoD personnel- SGT Feito needs their SSN and she will X-Org that individual to the proper funding source and they will plan their travel through DTS.

Bottom line: All travel for experts and witnesses needs to be coordinated through SGT Feito and Mr. Parra. Mr. Parra is responsible to ensure the travel occurs and the individuals are paid. Please notify SGT Feito and Mr. Parra when the travel needs to occur, and they will make it happen!

If you have any questions please contact Mr. Parra (CCed) at 202-685-1975.

v/r
CPT Fein

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Thursday, October 27, 2011 10:06 PM
To: 'coombs@armycourtmartialdefense.com'
Cc: Matthew kemkes; 'Tooman,Joshua J CPT MIL US USA TRADOC'; 'paul.r.bouchard@us.army.mil'; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. WO1 USA JFHQ-NCR/MDW SJA; 'Melissa Santiago'
Subject: US v. PFC BM
Attachments: 111027-Excludable Delay Memorandum.pdf

David,

Attached is the SPCMCA excludable delay accounting memo.

v/r
Ashden

From: Bouchard, Paul R CPT USA MIL (US) <paul.r.bouchard.mil@mail.mil>
Sent: Friday, October 28, 2011 9:03 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <ashden.fcin@jfhqncr.northcom.mil>;
cdl@cyberagentsinc.com; ts@cyberagentsinc.com
Cc: coombs@armycourtmaritaldefense.com; ts@cyberagentsinc.com; Santiago, Melissa S CW2 USA
MIL (US) <melissa.s.santiago@us.army.mil>; Parra, Jairo A. WO1 USA JFHQ-NCR/MDW SJA
<jairo.parra@jfhqncr.northcom.mil>
Subject: RE: Message from CPT Paul Bouchard (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: FOUO

Thanks, Ashden.

Paul

From: Bouchard, Paul R CPT USA MIL (US) <paul.r.bouchard.mil@mail.mil>
Sent: Friday, October 28, 2011 9:11 AM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <ashden.fein@jfhqncr.northcom.mil>;
coombs@armycourtartialdefense.com; Matthew kemkes
<matthew.kemkes@us.army.mil>; Tooman, Joshua J CPT USA MIL (US)
<joshua.j.tooman.mil@mail.mil>; edl@cyberagentsinc.com; ts@cyberagentsinc.com
Cc: Feito, Beatriz SGT USA JFHQ- NCR/MDW SJA <beatriz.feito@jfhqncr.northcom.mil>;
Parra, Jairo A. WO1 USA JFHQ-NCR/MDW SJA <jairo.parra@jfhqncr.northcom.mil>;
Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA
<JoDean.Morrow@jfhqncr.northcom.mil>
Subject: RE: US v. PFC BM (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: FOUO

Thank you, CPT Fein:

Do Eric Lakes and Trent Strittmann have to comply with this for the planned meeting in 10 days given that they already booked their travel?

Respectfully,
CPT Bouchard

From: Parra, Jairo A. WO1 USA JFHQ-NCR/MDW SJA
Sent: Friday, October 28, 2011 9:18 AM
To: 'Bouchard, Paul R CPT USA MIL (US)'; Fein, Ashden CPT USA JFHQ-NCR/MDW SJA; coombs@armycourt martialdefense.com; Matthew kemkies; Tooman, Joshua J CPT USA MIL (US); edt@cyberagentsinc.com; ls@cyberagentsinc.com
Cc: Feito, Beatriz SGT USA JFHQ- NCR/MDW SJA; Morrow III, JoDean, CPT USA JFHQ- NCR/MDW SJA
Subject: RE: US v. PFC BM (UNCLASSIFIED)
Signed By: PARRA.JAIRO.ALBERTO.1263937372

Classification: UNCLASSIFIED

Caveats: FOUO

Sir,

The short answer to your question is yes. I will attempt to work with them to get them reimbursed for the flight, provided it falls under the guidelines of the JFTR, and ensure that the rest of their TDY is handled in the appropriate manner. Please have them contact me (information below) or my NDEA, SGT Beatriz Feito at (202) 685-1975. If you have any further questions please let me know. Thank you.

v/r,

JP

Jairo A. Parra
WO1, JA
Legal Administrator
JFHQ-NCR, MDW
jairo.parra@jfhqnrcr.northcom.mil
jairo.parra@us.army.mil
jairo.parra@jfhqnrcr.northcom.smil.mil
(202) 685-1975 - Direct
(571) 249-9697 - Blackberry
(931) 572-7632 - Cell

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From: Bouchard, Paul R CPT USA MIL (US) <paul.r.bouchard.mil@mail.mil>
Sent: Friday, October 28, 2011 9:27 AM
To: Parra, Jairo A. WO1 USA JFHQ-NCR/MDW SJA <jairo.parra@jfhqncr.northcom.mil>; Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <ashden.fein@jfhqncr.northcom.mil>; coombs@armycourtmartialdefense.com; Matthew kemkes <matthew.kemkes@us.army.mil>; Tooman, Joshua J CPT USA MIL (US) <joshua.j.tooman.mil@mail.mil>; edl@cyberagentsinc.com; ts@cyberagentsinc.com
Subject: RE: US v. PFC BM (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: FOUO

Thank you, Chief.

Eric and Trent, please comply (soc below). Call or e-mail me if necessary.

V/R

CPT Bouchard

From: Bouchard, Paul R CPT USA MIL (US) <paul.r.bouchard.mil@mail.mil>
Sent: Thursday, November 3, 2011 9:59 AM
To: Santiago, Melissa S CW2 USA MIL (US) <melissa.s.santiago@us.army.mil>
Cc: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <ashden.fein@jfhqncr.northcom.mil>
Subject: RE: Information needed for meeting next week (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: FOUO

Ashden:

Just to recap -- where exactly will next week's meeting (Government's case presentation) be -- time, location, building, etc. Any updates appreciated.

FYI: I'll be in court November 8, so I won't be at the meeting, but the other members of the Defense Team will be present.

Note: Please cc our legal administrator, Chief Santiago, with any updates.

Thanks.

Paul

From: Bouchard, Paul R CPT USA MIL (US) <paul.r.bouchard.mil@mail.mil>
Sent: Thursday, November 3, 2011 11:52 AM
To: edl@cyberagentsinc.com
Cc: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <ashden.fein@jfhqncr.northcom.mil>
Subject: RE: FW: Perfect ruling by the Judge! (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: FOUO

Ashden:

Exactly where and when do we meet next week. Need specifics. I won't be there on Nov. 8 (US v. Esposito).
Any feedback appreciated.

Paul

-----Original Message-----

From: Eric Lakes [mailto:edl@cyberagentsinc.com]
Sent: Thursday, November 03, 2011 10:51 AM
To: Bouchard, Paul R CPT USA MIL (US)
Subject: re: FW: Perfect ruling by the Judge! (UNCLASSIFIED)

Email me the address that we have to go to next week

Eric Lakes
Digital Forensic Examiner
Certified Computer Examiner (CCE)
Certified Homeland Security - III
MCSE, MCP+I, MCP, Network Plus, A+
Cyber Agents, Inc.
<http://www.cyberagentsinc.com>
616 Pasadena Drive
Lexington, KY 40503
cell - 859.983.6655
land line - 859.523.9081 or 9082

Classification: UNCLASSIFIED

Caveats: FOUO

From: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
Sent: Thursday, November 03, 2011 12:08 PM
To: 'Bouchard, Paul R CPT USA MIL (US)'; 'Santiago, Melissa S CW2 USA MIL (US)'
Cc: 'coombs@armycourtmartialdefense.com'; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW
SJA
Subject: RE: Information needed for meeting next week (UNCLASSIFIED)

Paul,

Thanks. I will have the final location worked out today and send it out.

Ashden

From: Bouchard, Paul R CPT USA MIL (US) <paul.r.bouchard.mil@mail.mil>
Sent: Thursday, November 3, 2011 1:27 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <ashden.fein@jfhqncr.northcom.mil>;
Santiago, Melissa S CW2 USA MIL (US) <melissa.s.santiago@us.army.mil>;
edl@cyberagentsinc.com
Cc: coombs@armycourtmaritaldefense.com; Morrow III, JoDean, CPT USA JFHQ-
NCR/MDW SJA <JoDean.Morrow@jfhqncr.northcom.mil>
Subject: RE: Information needed for meeting next week (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: FOUO

Great. Thanks. Ashden.
Paul

From: Parra, Jairo A. WO1 USA JFHQ-NCR/MDW SJA
Sent: Thursday, November 03, 2011 2:04 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA; 'coombs@armycourtmartialdefense.com'; Matthew kemkes; 'Bouchard, Paul R CPT USA MIL (US)'; 'Tooman,Joshua J CPT MIL US USA TRADOC'; 'edl@cyberagentsinc.com'; 'ts@cyberagentsinc.com'
Cc: Feito, Beatriz SGT USA JFHQ- NCR/MDW SJA; Morrow III, JoDean, CPT USA JFHQ- NCR/MDW SJA
Subject: RE: US v. PFC BM (Party, Witness, Expert Travel) (UNCLASSIFIED)
Signed By: PARRA.JAIRO.ALBERTO.1263937372

Classification: UNCLASSIFIED

Caveats: FOUO

All,

I have not heard anything from any of the Defense Forensic Computer Experts in regards to their travel. If their travel orders and travel arrangements are not coordinated a fixed prior to them traveling we cannot ensure that they will be paid in an appropriate manner. It is important that they follow the procedures set in place to ensure proper traveling methods and entitlements are taken care of, and for accountability of funds IAW the JFTR. Thank you.

v/r,

JP

Jairo A. Parra
WO1, JA
Legal Administrator
JFHQ-NCR, MDW
jairo.parra@fhqnrcr.northcom.mil
jairo.parra@us.army.mil
jairo.parra@fhqnrcr.northcom.smil.mil
(202) 685-1975 - Direct
(571) 249-9697 - Blackberry
(931) 572-7632 - Cell

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From: Eric Lakes <edl@cyberagentsinc.com>
Sent: Thursday, November 3, 2011 2:48 PM
To: Parra, Jairo A. WO1 USA JFHQ-NCR/MDW SJA <Jairo.Parra@jfhqncr.northcom.mil>; Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>; coombs@armycourtmaritaldefense.com; Matthew kemkes <matthew.kemkes@us.army.mil>; Bouchard, Paul R CPT USA MIL (US) <paul.r.bouchard.mil@mail.mil>; Tooman,Joshua J CPT MIL US USA TRADOC <joshua.tooman@us.army.mil>; edl@cyberagentsinc.com; ts@cyberagentsinc.com
Cc: Feito, Beatriz SGT USA JFHQ- NCR/MDW SJA <Beatriz.Feito@jfhqncr.northcom.mil>; Morrow III, JoDean, CPT USA JFHQ- NCR/MDW SJA <JoDean.Morrow@jfhqncr.northcom.mil>
Subject: RE: US v. PFC BM (Party, Witness, Expert Travel) (UNCLASSIFIED)

Cyber Agents had already before told bout DTS made our flight, hotel and rental car reservations. We now know that for now on to coordinate all travel through the proper representative.

Eric Lakes
Digital Forensic Examiner
Certified Computer Examiner (CCE)
Certified Homeland Security - III
MCSE, MCP+, MCP, Network Plus, A+
Cyber Agents, Inc.
<http://www.cyberagentsinc.com>
616 Pasadena Drive
Lexington, KY 40503
cell - 859.983.6655
land line - 859.523.9081or 9082

From: Bouchard, Paul R CPT USA MIL (US) <paul.r.bouchard.mil@mail.mil>
Sent: Thursday, November 3, 2011 2:56 PM
To: edl@cyberagentsinc.com; Parra, Jairo A. WO1 USA JFHQ-NCR/MDW SJA
<jairo.parra@jfhqnqr.northcom.mil>; Fein, Ashden CPT USA JFHQ-NCR/MDW SJA
<ashden.fcin@jfhqnqr.northcom.mil>; coombs@armycourtmaritaldefense.com; Matthew
kemkes <matthew.kemkes@us.army.mil>; Tooman, Joshua J CPT USA MIL (US)
<joshua.j.tooman.mil@mail.mil>; ts@cyberagentsinc.com
Subject: RE: US v. PFC BM (Party, Witness, Expert Travel) (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: FOUO

Chief Parra:

We understand your position, however, our forensic team had booked their travel beforehand for the important meeting next week. From here, we're good to go DTS-wise, but for next week's meeting an exception to policy is in order.

Appreciate any feedback and your understanding on this matter.

Respectfully,
CPT Paul Bouchard
Defense Counsel
Trial Defense Services
Fort Meade, MD TDS
Office: 301-677-9231

From: Tooman, Joshua J CPT USA MIL (US) [joshua.j.tooman.mil@mail.mil]
Sent: Thursday, November 03, 2011 5:36 PM
To: Fein, Ashden CPT USA JFHQ-NCR/MDW SJA; coombs@armycourtmartialdefense.com
Cc: Matthew kemkes; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Bouchard, Paul R
CPT USA MIL (US); Haberland, John B CPT USA MIL (US); Overgaard, Angel M. CPT USA
JFHQ-NCR/MDW SJA
Subject: RE: US v. PFC BM (8-9 Nov 11 Meeting) (UNCLASSIFIED)
Attachments: Document.pdf
Signed By: joshua.tooman@us.army.mil

Classification: UNCLASSIFIED

Caveats: FOUO

Ashden

My signed acknowledgment of the terms of next week's meetings is attached.
Sorry for the delay.

v/r
Josh

From: Parra, Jairo A. WO1 USA JFHQ-NCR/MDW SJA
Sent: Thursday, November 03, 2011 7:56 PM
To: 'Bouchard, Paul R CPT USA MIL (US)'; edi@cyberagentsinc.com; Fein, Ashden CPT USA JFHQ-NCR/MDW SJA; coombs@armycourtmartialdefense.com; Matthew kemkes; Tooman, Joshua J CPT USA MIL (US); ls@cyberagentsinc.com
Subject: RE: US v. PFC BM (Party, Witness, Expert Travel) (UNCLASSIFIED)
Signed By: PARRA.JAIRO.ALBERTO.1263937372

Classification: UNCLASSIFIED

Caveats: FOUO

All,

Regardless of current arrangements for travel, I would like to have a conversation with Mr. Lakes and his team to ensure that his current travel arrangements fall under the JFTR otherwise, payments might not be able to be made in their entirety. If you have any questions please feel free to contact me at your earliest convenience.

v/r,

JP

Jairo A. Parra
WO1, JA
Legal Administrator
JFHQ-NCR, MDW
jairo.parra@jfhqnqr.northcom.mil
jairo.parra@us.army.mil
jairo.parra@jfhqnqr.northcom.smil.mil
(202) 685-1975 - Direct
(571) 249-9697 - Blackberry
(931) 572-7632 - Cell

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From: Eric Lakes <edl@cyberagentsinc.com>
Sent: Thursday, November 3, 2011 9:54 PM
To: Parra, Jairo A. WO1 USA JFHQ-NCR/MDW SJA <Jairo.Parra@jfhqncr.northcom.mil>; Bouchard, Paul R CPT USA MIL (US) <paul.r.bouchard.mil@mail.mil>; edl@cyberagentsinc.com; Fein, Ashden CPT USA JFHQ-NCR/MDW SJA <Ashden.Fein@jfhqncr.northcom.mil>; coombs@armycourtmaritaldefense.com; Matthew kemkes <matthew.kemkes@us.army.mil>; Tooman, Joshua J CPT USA MIL (US) <joshua.j.tooman.mil@mail.mil>; ts@cyberagentsinc.com
Subject: RE: US v. PFC BM (Here are the reservations we already booked once we had the set date)

Flights

2 Round-Trip Tickets

All flight times are local to each city.

Please check in with ASA DBA DELTA CONNECTION on the day of departure for your boarding pass.

Mon, Nov 7, 2011

Depart: 06:05 am Lexington, KY (LEX)
Arrive: 07:33 am Atlanta, GA (ATL)

Online check-in code: HH27WW

Delta Air Lines Delta Air Lines, Flight 5364
Economy Class
Operated by
ASA DBA DELTA
CONNECTION

Travel time: 1 hr 28 mins
Seat request: 9D, 9A

1 Stop - change planes in Atlanta, GA (ATL)
Connection Time: 1 hr 7 mins

Depart: 08:40 am Atlanta, GA (ATL)
Arrive: 10:37 am Baltimore, MD (BWI)

Delta Air Lines Delta Air Lines, Flight 2025
Economy Class

Travel time: 1 hr 57 mins
Seat request: 21E, 21C

Thu, Nov 10, 2011

Depart: 09:00 am Baltimore, MD (BWI)
Arrive: 10:32 am Charlotte, NC (CLT)

Online check-in code: F61LQD

US Airways US Airways, Flight 876
Economy Class

Travel time: 1 hr 32 mins
Seat request: 14D, 15C

1 Stop - change planes in Charlotte, NC (CLT)
Connection Time: 38 mins

Depart: 11:10 am Charlotte, NC (CLT)
Arrive: 12:24 pm Lexington, KY (LEX)

US Airways US Airways, Flight 3943
Economy Class
Operated by
US AIRWAYS EXPRESS-
AIR WISCONSIN

Travel time: 1 hr 14 mins
Seat request: 4F, 4D

Passengers

Frequent Flier Information

ERIC LAKES
TRENT STRUTTMANN

Delta Air Lines: 2233930466
Delta Air Lines: 2677938314

Flight policies

Hotel

1 Room, 3 Nights

Confirmation number: 3444628067

Hilton Garden Inn BWI Airport

1516 AERO DRIVE
Linthicum, MD 21090
1.410.691.0500

Contact: ERIC LAKES

Check in: Mon, Nov 7, 2011

Check out: Thu, Nov 10, 2011

Room 1: 1 King 1 Bedroom Accessible
Suite (2 adults)

Hotel policies

Attention - Hotel Front Desk

This is a pre-paid reservation. Please check your reservation system for payment information.

Pre-paid amount may not include extra fees payable to the hotel at check out.

Car

3 Days

Confirmation number: R9596170

Driver: ERIC LAKES

Dollar Rent A Car

Car type: Economy

Pick-up date: Mon, Nov 7, 2011, 11:07 AM

Drop-off date: Thu, Nov 10, 2011, 07:30

Pick-up location:

AM

Baltimore Washington International Airport

Drop-off location:

Baltimore Washington International Airport

Hours of operation

Sunday: 12:00AM - 11:59PM

Monday: 12:00AM - 11:59PM

Tuesday: 12:00AM - 11:59PM

Wednesday: 12:00AM - 11:59PM

Thursday: 12:00AM - 11:59PM

Friday: 12:00AM - 11:59PM

Saturday: 12:00AM - 11:59PM

Car policies

Attention - Car Rental Counter

This is a pre-paid reservation. Please check your reservation system for payment information covering time and mileage. The car pre-paid amount does not include optional items or extra charges associated with the reservation.

Pricing

Flight + Hotel + Car	\$1,063.50
Tax Recovery Charge & Service Fees:	\$169.35
Flight + Hotel + Car Total	\$1,232.85
Travel Protection- 2 plans	\$99.90
Total:	\$1,332.75

We charged a total of \$1,332.75 to your Visa® xxxx-xxxx-xxxx-2708.

INSTRUCTIONS FOR PREPARING AND ARRANGING RECORD OF TRIAL

USE OF FORM - Use this form and MCM, 1984, Appendix 14, will be used by the trial counsel and the reporter as a guide to the preparation of the record of trial in general and special court-martial cases in which a verbatim record is prepared. Air Force uses this form and departmental instructions as a guide to the preparation of the record of trial in general and special court-martial cases in which a summarized record is authorized.

Army and Navy use DD Form 491 for records of trial in general and special court-martial cases in which a summarized record is authorized. Inapplicable words of the printed text will be deleted.

COPIES - See MCM, 1984, RCM 1103(g). The convening authority may direct the preparation of additional copies.

ARRANGEMENT - When forwarded to the appropriate Judge Advocate General or for judge advocate review pursuant to Article 64(a), the record will be arranged and bound with allied papers in the sequence indicated below. Trial counsel is responsible for arranging the record as indicated, except that items 6, 7, and 15e will be inserted by the convening or reviewing authority, as appropriate, and items 10 and 14 will be inserted by either trial counsel or the convening or reviewing authority, whichever has custody of them.

1. Front cover and inside front cover (chronology sheet) of DD Form 490.
2. Judge advocate's review pursuant to Article 64(a), if any.
3. Request of accused for appellate defense counsel, or waiver/withdrawal of appellate rights, if applicable.
4. Briefs of counsel submitted after trial, if any (Article 38(c)).
5. DD Form 494, "Court-Martial Data Sheet."
6. Court-martial orders promulgating the result of trial as to each accused, in 10 copies when the record is verbatim and in 4 copies when it is summarized.
7. When required, signed recommendation of staff judge advocate or legal officer, in duplicate, together with all clemency papers, including clemency recommendations by court members.

8. Matters submitted by the accused pursuant to Article 60 (MCM, 1984, RCM 1105).
9. DD Form 458, "Charge Sheet" (unless included at the point of arraignment in the record).
10. Congressional inquiries and replies, if any.
11. DD Form 457, "Investigating Officer's Report," pursuant to Article 32, if such investigation was conducted, followed by any other papers which accompanied the charges when referred for trial, unless included in the record of trial proper.
12. Advice of staff judge advocate or legal officer, when prepared pursuant to Article 34 or otherwise.
13. Requests by counsel and action of the convening authority taken thereon (e.g., requests concerning delay, witnesses and depositions).
14. Records of former trials.
15. Record of trial in the following order:
 - a. Errata sheet, if any.
 - b. Index sheet with reverse side containing receipt of accused or defense counsel for copy of record or certificate in lieu of receipt.
 - c. Record of proceedings in court, including Article 39(a) sessions, if any.
 - d. Authentication sheet, followed by certificate of correction, if any.
 - e. Action of convening authority and, if appropriate, action of officer exercising general court-martial jurisdiction.
 - f. Exhibits admitted in evidence.
 - g. Exhibits not received in evidence. The page of the record of trial where each exhibit was offered and rejected will be noted on the front of each exhibit.
 - h. Appellate exhibits, such as proposed instructions, written offers of proof or preliminary evidence (real or documentary), and briefs of counsel submitted at trial.